

The Defendant/Counterclaim Plaintiff **MANAL MOHAMMAD YOUSEF**, through her undersigned attorney, James L. Hymes, III, hereby responds to the Second Interrogatories to Manal Yousef propounded by Sixteen Plus, as follows:

I. GENERAL OBJECTIONS

Defendant/Counterclaim Plaintiff **MANAL MOHAMMAD YOUSEF**, incorporates the following general objections into each and every interrogatory response as set forth below, and further, by submitting her responses to Interrogatories, does not waive any objections to subject matter jurisdiction, personal jurisdiction, service of process, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other defense or objection which may be presented whether by pleading or motion in this action:

1. This defendant/counterclaim plaintiff objects to that portion of plaintiff/counterclaim defendant's instructions and definitions to the extent that they impose any burden on this defendant not specifically provided for by the Virgin Islands Rules of Civil Procedure.

2. This defendant/counterclaim plaintiff objects to each interrogatory to the extent that any full answer thereto would require this defendant/counterclaim plaintiff to divulge information, documents, or communications protected by the attorney-client privilege or the attorney work product doctrine, or to the extent that it seeks information or documents reflecting attorney/client communications, attorney work product, or the work product of non-attorneys prepared for, or under the direction of an attorney, or in anticipation of litigation or for trial preparation.

3. This defendant/counterclaim plaintiff objects to each interrogatory to the extent that it seeks information or documents outside of this defendant's possession and custody, or in the control of a third-party over whom this defendant/counterclaim plaintiff has no power.

4. This defendant/counterclaim plaintiff objects to each interrogatory to the extent it is overly broad, unduly vague, or ambiguous.

5. This defendant/counterclaim plaintiff objects to each interrogatory to the extent it requires the production of information which would be burdensome, oppressive, or expense to produce.

6. This defendant/counterclaim plaintiff objects to each interrogatory to the extent that it seeks information that is not, in any meaningful way, related to the parties' claims or defenses.

7. This defendant/counterclaim plaintiff objects to each interrogatory, or any portion thereof, that seeks information on matters of public record, or other information to which plaintiff/counterclaim defendant has equal access.

8. This defendant/counterclaim plaintiff objects to each interrogatory, or portion thereof, which requires a response that may contain or reflect subsequent remedial measures or reflect information protected by the privilege of self-critical evaluation.

9. This defendant/counterclaim plaintiff objects to each interrogatory to the extent it seeks information not calculated to lead to the discovery of relevant or admissible evidence.

10. This defendant/counterclaim plaintiff objects to any inadvertent disclosure of privileged information being deemed a waiver, or being used affirmatively against them for any reason or purpose.

11. This defendant/counterclaim plaintiff objects to each interrogatory to the extent that it seeks information in excess of the numerical limitation including all discrete subparts.

II. INTERROGATORIES

Interrogatory 17:

In Interrogatory #9 in the First Interrogatories to you, you were asked the following and provided the following Response:

Interrogatory 9:

Please list all financial accounts you have, that are fully or partially in your name or as to which you are a beneficiary from January 1, 1995 through December 31, 2000, including but not be limited to all: bank accounts, stock brokerage accounts, negotiable instrument accounts, retirement accounts, trading or options accounts, and funds transfer accounts, For each identify the name and address of the institution, the title holder(s), the beneficiaries or trust beneficiaries as well as the last four digits of the account number(s).

Response:

I object to providing any identifying bank or financial institution account numbers on the grounds they need to be kept out of the public domain for safety reasons. Without waiving this objection, the money which was given to me by my father was managed for me by my brother in an account over which he had management control.

In a Rule 37 conference, your counsel, Attorney Hymes agreed to the following:

HISHAM HAMED, et al. v. MANAL MAOHAMMAD YOUSEF, et al.
SCVI/STX Civil Nos. SX-16-CV-00065 and SX-17-CV-00342
MANAL MOHAMMAD YOUSEF'S RESPONSE TO
SECOND INTERROGATORIES TO MANAL YOUSEF

Re: Sixteen Plus v Manal Yousef et al., SX-16-CV-65

Dear Attorney Hymes:

In follow up to our Rule 37 conference, I want to memorialize what I understand we agreed on:

- 1) You will produce (1) the power of attorney from Manal Yousef to Jamil Yousuf as well as (2) the notarized signature page of the interrogatory answers now.
- 2) You will confirm in writing that your only communications have been with Jamil Yousuf, not Manal Yousef. In exchange, I will withdraw the request to produce a privilege log.
- 3) Regarding Manal's passports, you are obtaining copies as promptly as you can, which you will then file under seal with the Court, notifying me when you do.
- 4) As for Interrogatory 9, you will amend to say that Manal has no documents that have any of the requested information.

Please confirm that I have accurately summarized our discussion. If not, please let me know what you recall differently. Thanks.

Describe in detail the full response to Interrogatory #9, unless you had no such accounts, none were in your name or no such accounts existed where you were a beneficiary -- for the stated time period. If there were no such accounts, state, as agreed "I had, had in my name or was the beneficiary of no such accounts for that time period."

RESPONSE:

A copy of my Power of Attorney to Jamal has been produced, as have copies of my passports.

I have no documents relating to my receipt of funds from Sixteen Plus. My brother gave me cash from time to time as I needed it.

Interrogatory 18:

In that same Rule 37 conference, your counsel agreed to produce a power of attorney from you to Jamil. Have you produced it, and if not, why not?

RESPONSE:

A copy of the Power of Attorney has been produced.

Interrogatory 19:

You state in response to Interrogatory #11:

Response:

In the years 1998, 1999, and 2000, payments were made to me by the Sixteen Plus Corporation in the amount of \$360,000.00 in each of those years. In 1998, the payment was made by Waleed Hamed in cash. I do not know the form of the payment of \$360,000.00 in 1999, or in 2000. I have not made a calculation of the accrued interest due through July 1, 2017, or the daily accrual of interest after July 1, 2017. These are simple mathematical calculations that an economist, bookkeeper, or CPA can make based on the terms and conditions of the note given to me by the Sixteen Plus Corporation. At such time as these calculations are made, this response will be supplemented.

Please describe all of the following with a full description of the documents, dates and persons involved:

- A. All taxes paid to the US Virgin Islands Government for the three payments of \$360.000 from the Virgin Islands Corporation, Sixteen Plus. (I.e. all VI sourced income.)

RESPONSE:

As a non-US Resident, and non-US Citizen, I did not think I have to pay taxes. If I do, I do not mind paying them when the case is over.

- B. All taxes paid to the US Government for the three payments of \$360.000 from the Virgin Islands Corporation, Sixteen Plus. (I.e. all US source income.)

RESPONSE:

As a non-US Resident, and non-US Citizen, I don't think I have to pay tax, and if I have to pay, I do not mind paying when the case is over.

- C. All taxes paid to the governments of your residence and citizenship for the three payments of \$360.000 from the Virgin Islands Corporation, Sixteen Plus.

RESPONSE:

As a non-US Resident, and non-US Citizen, I did not think I have to pay taxes. If I do, I do not mind paying them when the case is over.

- D. All transfers of funds to you or for your benefit for those three payments.

RESPONSE:

I receive cash from my brother from time to time, as needed.

Interrogatory 20:

With regard to the three payments to you of \$360,000 each, in the years 1998, 1999, and 2000, please describe in detail:

A. In what form the payments were made

RESPONSE:

Cash.

B. Where those funds were initially deposited.

RESPONSE:

They were not deposited.

C. If you have by the date of your response here, received some or all of those funds, where they are or if spent or otherwise devised, what you spent them on or where they went.

RESPONSE:

My brother gave me cash from time to time as I needed it.

D. If you have not yet received those funds, where they are now.

RESPONSE:

All funds received by my brother have been disbursed to me over time, and there are none left to be distributed.

Interrogatory 21:

Give the dates and identify the person with regard to all communications with any person, including any attorney with who you have had any in person, email, telephone, or computer conversation or communication regarding your upcoming deposition or the answers to discovery from July 1, 2022 to the date of your response here. If you do not respond to this under claim of privilege, supply a privilege log.

RESPONSE:

I object to responding to this interrogatory, and to providing a privilege log for the reason that all of my communications were through an attorney, and that to provide a privilege log would defeat the purpose of privilege of attorney/client confidentiality.

VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: September 15th, 2022.

Manal Mohammad Yousef

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) ss.
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On this, the 15 day of September, 2022, before me, the undersigned officer, personally appeared Manal Mohammad Yousef, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within document and acknowledged that she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

Notary Public



Exp. date 12/31/2022

Respectfully Submitted,

DATED: September 20, 2022.

LAW OFFICES OF JAMES L. HYMES, III, P.C.
*Counsel for Plaintiff/Counterclaim
Defendant Manal Mohammad Yousef
a/k/a Manal Mohamad Yousef*

By: */s/ James L. Hymes, III*

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CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of September, 2022, I caused an exact copy of the foregoing ***“Manal Mohammad Yousef’s Response to Second Interrogatories to Manal Yousef”*** to be served electronically by e-mail to the following counsel of record:

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/s/ James L. Hymes, III

Banko di Seguro Sosial
Sociale Verzekeringsbank • Social Insurance Bank

Seguro Card
Strikt persoonlik.
Misbruik wordt gestraaf.

SVB IDnr
680422760

Hoofdverzekerde / Insured under
611205790

Naam / Name
AKHRAS-MOHAMMAD, MANAL MONAMMED YOUSEF

Geslacht / Gender
V

Geboortedatum / Date of birth
22-04-1968

Huisarts / General practitioner
DENNAOUI M.M.Y.

Geldig / Valid
25-03-2008 «» **25-03-2010**

Geregistreerd / Registered
St. Maarten



Kaartnummer / Card number
200604861

Handtekening
Verzekerde

Deze kaart is eigendom van de SVB.

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