

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

MANAL MOHAMMAD YOUSEF,
Plaintiff

v.

SIXTEEN PLUS CORPORATION,
Defendant.

and

SIXTEEN PLUS CORPORATION,
Counter-Plaintiff

v.

MANAL MOHAMMAD YOUSEF,
Counter-Defendant,

and

SIXTEEN PLUS CORPORATION,
Third-Party Plaintiff

v.

FATHI YUSUF,
Third-Party Defendant,

CIVIL NO. SX-2017-CV-00342

**ACTION FOR DEBT AND
FORECLOSURE**

**COUNTERCLAIM FOR
DAMAGES**

THIRD PARTY ACTION

JURY TRIAL DEMANDED

Consolidated With

CIVIL NO. SX-2016-CV-00065

**ACTION FOR
DECLARATORY JUDGMENT,
CICO and FIDUCIARY DUTY**

COUNTERCLAIM

JURY TRIAL DEMANDED

SIXTEEN PLUS CORPORATION,
Plaintiff,

v.

MANAL MOHAMMAD YOUSEF,
Defendant.,

and

MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff.,

v.

SIXTEEN PLUS CORPORATION,
Counter-Defendant.

**NOTICE OF
SIXTEEN PLUS CORPORATION'S
WITHDRAWAL
OF ITS MOTION FOR SUMMARY JUDGMENT
FILED OCTOBER 21, 2016**

COMES NOW Sixteen Plus Corporation and provides NOTICE of its withdrawal of its *Motion for Summary Judgment* originally filed, prior to consolidation, in SX-2016-CV-00065.

1. On October 21, 2016, Sixteen Plus filed a motion for summary judgment predicated on Manal Yousef's refusal to participate in the litigation, as follows:

1. Plaintiff commenced the above-captioned civil action (this "Action") on February 12, 2016 by filing the Complaint.
2. On or about June 10, 2016, Defendant entered a general notice of appearance in this Action by and through Kye Walker, Esquire, of The Walker Legal Group.
3. Also on or about June 10, 2016, Defendant filed her Motion for Extension of Time wherein Defendant stated that "Ms. Yousef was served with the Complaint and Summons in this case on or about April 4, 2016 in St. Maarten."
4. Also in her Motion for Extension of Time, Defendant requested that her time to respond to the Complaint be extended until June 30, 2016.
5. On June 28, 2016, the Court (acting by and through Honorable Harold W.L. Willocks, Superior Court Judge) granted Defendant's Motion for Extension of Time and ordered that Defendant shall have until June 30, 2016 to respond to the Complaint.
6. The motion was filed months later, after Manal had not further responded.

2. On March 30, 2017, Manal did file her Answer and Counterclaim—placing the issues in the instant motion in dispute, and no longer subject to summary judgment.

3. Thus, Sixteen Plus withdraws this motion.

Counsel for Sixteen Plus Corporation

Dated: December 11, 2022

/s/ Carl J. Hartmann III

Carl J. Hartmann III, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that this document complies with the page and word limitations set forth in Rule 6-1(e) and that on **December 11, 2022**, I served a copy of the foregoing by email and the Court's E-File system, as agreed by the parties to:

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Courtesy copy to Kevin Rames, Esq.

/s/ Carl J. Hartmann III