

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

Eleanor Abraham, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL NO. SX-12 CV-11
)	
St. Croix Renaissance Group, LLLP,)	ACTION FOR DAMAGES
)	
Defendant.)	JURY TRIAL DEMANDED
)	

**DEFENDANT ST. CROIX RENAISSANCE GROUP LLLP'S
MOTION FOR A MORE DEFINITE STATEMENT PURSUANT TO RULE 12(e)**

The complaint filed in this case lists over 500 plaintiffs seeking damages for property damages and personal injuries from different kinds of alleged exposures (asbestos, bauxite ore, bauxite residue, etc.) that allegedly emanated for years from the former alumina processing plant located on a site now owned by the defendant, St. Croix Renaissance ("SCRG").

SCRG hereby moves pursuant to Rule 12(e) for a more definite statement. The basis for this motion is more fully set forth in the memorandum filed with this motion, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully submitted that the relief sought pursuant to Rule 12(e) be granted.

Dated: August 6, 2012

/s/Joel H. Holt, Esq.
Counsel for Defendant SCRG
Law Offices of Joel H. Holt
2132 Company Street, Suite 2
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 773-8709
Email: holtvi@aol.com

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Dated: August 6, 2012

/s/Carl J. Hartmann III, Esq.
Counsel for Defendant SCRG
5000 Estate Coakley Bay, L-6
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 719-8941
Email: carl@hartmann.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2012, I filed the foregoing with the Clerk of the Court, and delivered by ECF to the following:

Lee J. Rohn, Esq.
Law Office of Rohn and Carpenter, LLC
1101 King St.
Christiansted, VI 00820
Counsel for the Plaintiffs

/s/Joel H. Holt