

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
 DIVISION OF ST. THOMAS & ST. JOHN

\* \* \* \* \*

REVERE HIGH YIELD FUND, LP.	)	
	)	
Plaintiff,	)	
	)	CIVIL NO. 16- CV - 06
v.	)	
	)	<i>IN REM</i> ACTION IN
<i>M/V MISTER B</i> , her tackle, gear,	)	ADMIRALTY TO FORECLOSE
and all of her appurtenances, <i>in rem</i> ,	)	FIRST PREFERRED SHIP
	)	MORTGAGE
and	)	
	)	IN PERSONAM ACTION FOR
<i>M/V AUTO TRANS-IT</i> , her tackle, gear,	)	DAMAGES
and all of her appurtenances, <i>in rem</i> ,	)	
	)	
and	)	
	)	
BOYSON, INC.; OCEAN LINK	)	
ENTERPRISES, LTD.; ARTHUR’S LEGACY,	)	
LLC; BREEZE SHIPPING, LLC; CHERYL	)	
BOYNES-JACKSON, individually and as	)	
trustee; NOEL U. BOYNES, SR.; BERNICE	)	
MAHONEY-BOYNES; CHEMICA B.	)	
JACKSON, as trustee; BERNICE C. BOYNES;	)	
and MICHAEL JACKSON, SR.,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF’S PROPOSED SCHEDULING PLAN**

COMES NOW the Plaintiff, REVERE HIGH YIELD FUND, LP (“Plaintiff” or “Revere”), through its undersigned counsel, pursuant to this Court’s order, and hereby proposes the following scheduling plan to govern dates and deadlines in this case:

1. On or before July 21, 2016 at 3:00 p.m., the parties will submit simultaneous briefing on the potential conflict of interest issue between the defendants.
2. On or before August, 1, 2016, all corporate defendants will appear and file an

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answer to the Complaint through counsel, and all individual defendants will appear and file an answer to the Complaint, either through counsel or *pro se*. No requests for extension of time to appear and file an answer to the Complaint will be granted.

3. Revere respectfully requests that a hearing on the motion for interlocutory sale be held on or before August 12, 2016.

4. There has been no objection or challenge to the arrest of M/V *Mister B*, and no defendant or person claiming an interest in M/V *Mister B* has requested a hearing to vacate the arrest of said vessel pursuant to Supplemental Rule E(4)(f). Therefore, Revere avers that no such hearing is needed.

5. Discovery Plan.

(a) All written discovery shall be served on or before September 15, 2016.

(b) All fact depositions shall be completed by December 31, 2016.

(c) Fact discovery shall be closed January 15, 2017.

(d) Trial experts must be disclosed pursuant to FED. R. CIV. P. 26(a)(2) with reports by January 15, 2017.

(e) Rebuttal experts must be disclosed pursuant to FED. R. CIV. P. 26(a)(2) by February 1, 2017.

(f) All expert depositions shall be completed by February 28, 2016.

(g) The parties shall file their portions of the joint pretrial order per Court order.

6. Other items.

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- (a) Mediation shall be commenced no later than January 15, 2017.
- (b) All dispositive motions shall be filed by March 15, 2017.
- (c) The case shall be ready for trial by April 1, 2017.

WHEREFORE, for the foregoing reasons, Revere respectfully requests that the Court enter an appropriate order adopting the above proposed scheduling plan.

Respectfully submitted,

Dated: July 13, 2016

/s/ Kanaan L. Wilhite  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of Court pursuant to *LRCi. 5.4* with the CM/ECF system this 13th day of July, 2016, which will send a notice of electronic filing to the following Filing User constituting valid service pursuant to *LRCi. 5.4(i)(1)*:

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/s/ Kanaan L. Wilhite