IN THE SUPERIOR COURT
OF THE VIRGIN ISLANDS

FILED
November 21, 2026 11:35 AM
SX-2026-CV-00068
TAMARA CHARLES
CLERK OF THE COURT

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

****

STONEHOUSE JUNCTION, LLC, Plaintiff, v. ALLENTON BROWNE and PHOENIX STX, LLC, Defendants.	SX-2026-CV-00068
ALLENTON BROWNE and PHOENIX STX, LLC, Counter-Plaintiffs, v. STONEHOUSE JUNCTION, LLC, Counter-Defendant.	
ALLENTON BROWNE, PHOENIX STX, LLC, and NESCAR, LLC, Third-Party Plaintiffs, v. NESTOR A. PARALITICCI AND CARMEN PARALITICCI, Trustee of the Nestor A. Paraliticci Trust, individually and Nestor A. Paraliticci Trust dated April 17, 2002 and ARIZONA, INC., Third-Party Defendants.	

MOTION FOR ENTRY OF DEFAULT

TO: TAMARA CHARLES
Clerk of the Court

Third-Party Defendants, **NESTOR A. PARALITICCI AND CARMEN PARALITICCI, Trustee of the Nestor A. Paraliticci Trust, individually and Nestor A. Paraliticci Trust dated**

April 17, 2002 and ARIZONA, INC., herein having failed to answer, or otherwise plead in the above-entitled action; and the time for appearance having expired, you are requested to enter the default of said defendants, pursuant to Superior Court Rule 47. The Third-Party Defendants, **NESTOR A. PARALITICCI AND CARMEN PARALITICCI, Trustee of the Nestor A. Paraliticci Trust, individually and Nestor A. Paraliticci Trust dated April 17, 2002,** were served on August 31, 2026 via process server at 48 Tide Village, St. Croix, U.S. Virgin Islands and the defendant, **ARIZONA, INC.,** was served with the Summons and Third-party Complaint on September 11, 2026 via process server at 439 Work & Rest, St. Croix, U.S. Virgin Islands as evidenced by the Proof of Service filed herewith. More than twenty (20) days have elapsed since the date of service and the Third-Party Defendants have not appeared or answered, in person or otherwise. **(See attached Proof of Service marked as Exhibits A-F).**

WHEREFORE, Third-party Plaintiff prays for any entry of default against Third-Party Defendants, **NESTOR A. PARALITICCI AND CARMEN PARALITICCI, Trustee of the Nestor A. Paraliticci Trust, individually and Nestor A. Paraliticci Trust dated April 17, 2002 and ARIZONA, INC.**, together with such other and further relief as the Court shall deem just and proper.

Respectfully submitted,

Law Office of Martial A. Webster, Sr.
Attorney for Defendants/ Counter-Plaintiffs/ Third-party Plaintiffs

Dated: November 21, 2026 By: /s/ Martial A. Webster

Martial A. Webster, Sr., Esq.
116 Queen Cross Street,
Frederiksted, VI 00840
P.O. Box 1568
Kingshill, VI 00851
Tel.: (340) 772-3555
attywebster@hotmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing **MOTION FOR ENTRY OF DEFAULT** was sent via email notification through the Superior Court C-Track e-filing system to **Mark W. Eckard, Esq., Raines Feldman Littrell, LLP**, 824 North Market St., Suite 805, Wilmington, DE 19801 and via U.S. Mail certified mail to **NESTOR A. PARALITICCI AND CARMEN PARALITICCI, Trustee of the Nestor A. Paraliticci Trust, individually and Nestor A. Paraliticci Trust dated April 17, 2002** of P.O. Box 24655, Christiansted, VI 00824, **ARIZONA, INC.** of P.O. Box 8317, Christiansted, VI 00823 on this 21st day of November 2026.

/s/ Martial A. Webster

Martial A. Webster, Sr., Esq.