



DENIED without prejudice to renewal after the expiration of the stay ordered by Judge Abrams.

REVISION / LEGAL

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Doing business as The Law Offices of Anderson J. Duff in the State of New York

August 28, 2018

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/31/18

SO ORDERED  
  
 HENRY PITMAN  
 UNITED STATES MAGISTRATE JUDGE

8-31-18

VIA ECF

United States Magistrate Judge Pitman  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

RE: Plaintiff's Third Request for Extension of Deadlines  
BMaddox Enterprises LLC v. Milad Oskouie, et al., 17-cv-1889-RA-HBP

Dear Magistrate Judge Pitman:

In part because Plaintiff's pending motions may be dispositive, Plaintiff hereby requests an extension of the current deadline for dispositive motions, which is **Monday, July 3, 2018**.

Plaintiff is prepared to submit a fully briefed motion for summary judgment on or before the current deadline, but its ability to do so has been curtailed by Defendant's failure to participate in the discovery process. The motions currently pending before the Court may narrow the scope of or make redundant Plaintiff's contemplated motion for summary judgment. For the foregoing reasons, Plaintiff requests extension of the July 3, 2018 deadline and all subsequent deadlines by two months or such other time as the Court sees fit.

If the Court grants Plaintiff's requested two-month extension, the new deadline for dispositive motions would be **Friday, November 2, 2018**. The current deadline for the Pretrial Order, **July 31, 2018**, would likewise be extended to **Friday, November 30, 2018**.

This is Plaintiff's third request for extension of these deadlines. Plaintiff's first and second requests were granted by the Court. Defendants have not consented to Plaintiff's request for an extension because Defendants' counsel stated in an August 29, 2018 email that he is unable to contact his client. (Ex. A.) The original deadline for dispositive motions was April 30, 2018. (Scheduling Order 5, ECF No. 66.) The Court amended this deadline with two revised scheduling orders on April 25, 2018 and June 28, 2018. (ECF No. 146; ECF No. 165.)



Because Plaintiff's requested extension would affect the current deadline for the Pretrial Order, a Proposed Revised Scheduling Order is attached.

Respectfully submitted,



Anderson J. Duff

AJD/rr  
Encl.

Wednesday, August 29, 2018 at 6:16:30 PM Eastern Daylight Time

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**Subject:** Re: FW: Activity in Case 1:17-cv-01889-RA-HBP BMaddox Enterprises LLC v. Milad Oskouie, Osko M Ltd., and Platinum Avenue Holdings Pty, Ltd. Order  
**Date:** Wednesday, August 29, 2018 at 5:58:05 PM Eastern Daylight Time  
**From:** Saul Roffe  
**To:** Anderson Duff

Thank you. I do not know what he is referring to as far as attempting to contact me. I have not been in contact with him since I made my motion to withdraw. I am not in contact with him at all. I don't know that I can agree to it because I cannot reach him.

On August 29, 2018 at 5:49 PM Anderson Duff <anderson@revisionlegal.com> wrote:

Saul:

Please find the Court's recent Order attached for your convenience. Please let us know if you consent to a further two-month extension of the deadline for dispositive motions in this case. If you are in touch with your client, please tell him to stop harassing us with abusive telephone calls.

-Anderson-

[anderson@revisionlegal.com](mailto:anderson@revisionlegal.com)

212.996.4103

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**From:** "NYS ECF Pool" <NYS ECF Pool@nysd.uscourts.gov>  
**Date:** Wednesday, August 29, 2018 at 5:44 PM  
**To:** "CourtMail@nysd.uscourts.gov" <CourtMail@nysd.uscourts.gov>  
**Subject:** Activity in Case 1:17-cv-01889-RA-HBP BMaddox Enterprises LLC v. Milad Oskouie, Osko M Ltd., and Platinum Avenue Holdings Pty, Ltd. Order

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U.S. District Court

Southern District of New York

**Notice of Electronic Filing**

The following transaction was entered on 8/29/2018 at 5:43 PM EDT and filed on 8/29/2018

**Case Name:** BMaddox Enterprises LLC v. Milad Oskouie, Osko M Ltd., and Platinum Avenue Holdings Pty, Ltd.

**Case Number:** 1:17-cv-01889-RA-HBP

**Filer:**

**Document Number:** 166

**Docket Text:**

**ORDER: The Court has received the attached letter from Defendant Milad Oskouie via chambers email. In the letter, Mr. Oskouie indicates that he has been unable to reach his attorney to discuss this case. Counsel for Mr. Oskouie is hereby ordered to update the Court on the status of his representation of Mr. Oskouie by September 5, 2018. SO ORDERED. (Signed by Judge Ronnie Abrams on 8/29/2018) (anc)**

**1:17-cv-01889-RA-HBP Notice has been electronically mailed to:**

Eric William Misterovich eric@revisionlegal.com, mary@revisionlegal.com, rachel@revisionlegal.com

John A. Di Giacomo john@revisionlegal.com, mary@revisionlegal.com, rachel@revisionlegal.com

Anderson Josiah Duff anderson@revisionlegal.com, ajd@andersonjduff.com, eric@revisionlegal.com, mary@revisionlegal.com, rachel@revisionlegal.com

**1:17-cv-01889-RA-HBP Notice has been delivered by other means to:**

Saul Roffe  
Sirota & Sirota, LLP(Queens)  
125 Beach 128th Street  
Queens, NY 11694

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=8/29/2018] [FileNumber=20740499-0] [302b0549cb489dc2b172553f4dc17b88ea2fc5d9f4549a102b5419895aa67ba55943c50ac02987bb8b89f7c2ce053df6ba17637fa80f7f66afb24d742530694a]]

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BMADDOX ENTERPRISES LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 17-cv-1889-RA-HBP
	)	
MILAD OSKOUIE, OSKO M LTD, and	)	<b>[PROPOSED] REVISED SCHEDULING</b>
PLATINUM AVENUE HOLDINGS PTY,	)	<b>ORDER</b>
LTD,	)	
	)	
Defendants.	)	
	)	
MILAD OSKOUIE and PLATINUM	)	
AVENUE HOLDINGS PTY, LTD,	)	
	)	
Counterclaim Plaintiffs,	)	
	)	
v.	)	
	)	
BMADDOX ENTERPRISES LLC and	)	
BRANDON MADDOX,	)	
	)	
Counterclaim Defendants.	)	

PITMAN, United States Magistrate Judge:

For the reasons set forth in Plaintiff’s August 29, 2018 letter motion requesting extension of the remaining deadlines originally set forth in the Court’s September 21, 2017 Scheduling Order, ECF No. 66, and modified by the Court’s April 25, 2018 Revised Scheduling Order, ECF No. 146, and the Court’s June 28, 2018 Revised Scheduling Order, ECF No. 165, it is hereby ORDERED that:

1. Dispositive motions, if any, shall be made no later than November 2, 2018.

2. The Pretrial Order, in the form required by Judge Abrams' rules, along with all other pretrial submissions required by Judge Abrams, shall be filed on November 30, 2018, or thirty (30) days after the final decision on any dispositive motion (if the pretrial order is still necessary after such decision), whichever date is later. Plaintiff shall serve a draft of their portion of the Pretrial Order on counsel for defendant no later than fifteen days prior to the Pretrial Order's due date. For the convenience of all parties, a copy of Judge Abrams' rules is available on the Court's website: [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov).

Dated: New York, New York  
August \_\_\_\_\_, 2018

SO ORDERED

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Henry Pitman  
United States Magistrate Judge