



**DECLARATION OF ANDERSON J. DUFF**

I, Anderson J. Duff, declare under penalty of perjury under the laws of the United States that the following is true and correct:

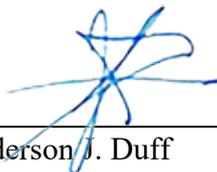
1. I am an attorney admitted to practice before the Southern District of New York.
2. On November 6, 2017, I served Plaintiff's first set of interrogatories and first requests for the production of documents on Defendants.
3. On October 18, 2019, Defendant Milad Oskouie ("Oskouie") sent copies of the same responses and objections to Plaintiff's interrogatories and requests for production to each of the three Defendants that Defendants served on December 6, 2017. Defendants made no substantive edits to their responses and only deleted references to their first attorney of record, added verification statements to all responses, and updated the date in the signature block for each set of responses. I used the "compare documents" tool in Adobe Acrobat Pro DC to compare each document Defendants sent to Plaintiff on December 6, 2017 with the corresponding document attached to Defendant Oskouie's October 18, 2019 email. The results, which show that Defendant did not make any substantive edits to the documents, are attached hereto as Exhibit A.
4. Although Defendants' responses promise, as they did in 2017, to answer nearly all of Plaintiff's requests by producing responsive documents, Defendants did not even attempt to produce any documents.
5. The same day that Defendant Oskouie emailed copies of the non-responsive responses Defendants' served in 2017, I responded via email stating "You did not

produce any documents. This is unacceptable, and we will be notifying the court unless you produce before the deadline.” (Ex. B, 2.)

6. Although the plain language of the Court’s September 30, 2019 Order is clear and unambiguous, and although I expressly notified Defendant Oskouie on October 18, 2019 that re-sending the same responses and objections Defendants served in 2017 is not adequate, Defendants made no attempt to comply with the Court’s Order.
7. Rather than attempt to comply with the Court’s Order, Defendant Oskouie responded “I do bring to your attention the EU GDPR and Iranian Data Protection. Please bear in mind that the GDRP [sic] is an extensive and complex regulatory framework and is enforceable.” (Ex. B, 1.)

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Date: New York, New York  
October 22, 2019

By:   
Anderson J. Duff