

EXHIBIT B

Subject: Re: Discovery docs

Date: Friday, October 18, 2019 at 6:26:53 PM Eastern Daylight Time

From: Anderson Duff <anderson@revisionlegal.com>

To: Milad O <milad.oskouie@gmail.com>

We received hundreds of pages of non-responsive materials that only show that you are not participating in good faith. You are free to make whatever arguments you like to justify disobeying a court order to the court.

-Anderson-

anderson@revisionlegal.com

212.996.4103

From: Milad O <milad.oskouie@gmail.com>

Date: Friday, October 18, 2019 at 6:17 PM

To: Anderson Duff <anderson@revisionlegal.com>

Subject: Re: Discovery docs

Hi Anderson,

Further to my email above, and my ongoing discovery efforts, I do bring to your attention the EU GDPR and Iranian Data Protection.

Please bear in mind that the GDRP is an extensive and complex regulatory framework and is enforceable.

Regards

Milad

On Sat, Oct 19, 2019 at 1:06 AM Milad O <milad.oskouie@gmail.com> wrote:

Hi Anderson,

In ECF filing 154, you admit to receiving over 700 pages of material from my previous lawyers.

Regards

Milad

On Sat, Oct 19, 2019 at 12:31 AM Anderson Duff <anderson@revisionlegal.com> wrote:

Your document production is wholly deficient. Your previous attorneys can tell you exactly how.

-Anderson-

anderson@revisionlegal.com

212.996.4103

From: Milad O <milad.oskouie@gmail.com>

Date: Friday, October 18, 2019 at 5:30 PM

To: Anderson Duff <anderson@revisionlegal.com>

Subject: Re: Discovery docs

Dear Anderson,

My previous attorney, Saul Roffe, has already provided you with responsive documents. You did acknowledge their receipt.

My objections and responses were sent to you earlier today.

Regards

Milad Oskouie

On Fri, Oct 18, 2019 at 7:44 PM Anderson Duff <anderson@revisionlegal.com> wrote:

You did not produce any documents. This is unacceptable, and we will be notifying the court unless you produce before the deadline.

-Anderson-

anderson@revisionlegal.com

212.996.4103

From: Milad O <milad.oskouie@gmail.com>

Date: Friday, October 18, 2019 at 6:48 AM

To: Anderson Duff <anderson@revisionlegal.com>, "ajd@revisionlegal.com" <ajd@revisionlegal.com>

Subject: Discovery docs

Hello Anderson,

Please find attached a copy of responses to your requests, as per the court order earlier this month.

I have also end these via international courier.

Regards

Milad