

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

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BMADDOX ENTERPRISES LLC,  
  
  Plaintiff,  
  
  v.  
  
MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS PTY, LTD,  
  
  Defendants.

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MILAD OSKOUIE and PLATINUM AVENUE  
HOLDINGS PTY, LTD,  
  
  Counterclaim Plaintiffs,  
  
  v.  
  
BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,  
  
  Counterclaim Defendants.

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Case No. 17-cv-1889-RA-SLC

**JOINT STATUS REPORT**

Dear Judge Abrams:

Plaintiff and Counterdefendant, BMaddox Enterprises LLC, along with Counterdefendant Brandon Maddox (“Maddox”) and Defendant and Counterclaimant Milad Oskouie (“Oskouie”), hereby submit this joint status report as directed by Magistrate Judge Cave during the June 17, 2020 telephone conference in the above-captioned matter as well as the Court’s Order that issued the same day. (ECF No. 194.) In response to the Court’s first inquiry, Plaintiff states that it does not intend to withdraw its Motion to Dismiss Counterclaims, ECF No. 67, and instead intends to incorporate that motion into Plaintiff’s anticipated motion for summary judgment against

Defendant Oskouie. The Parties' proposed briefing schedules for Plaintiff's intended Motion for Summary Judgment against Defendant Oskouie and Motion for Default Judgment against Defendants Osko M. Ltd. and Platinum Avenue Holdings Pty., Ltd. (the "Entity Defendants") are described below.

**A. Plaintiff's Motion for Default Judgment**

The Clerk of the United States District Court for the Southern District of New York issued a Certificate of Default as to the Entity Defendants on June 18, 2020. (Certificate of Default, ECF No. 197.) In accordance with Your Honor's Emergency Individual Rules and Practices in Light of COVID-19 ("Emergency Rules"), Plaintiff intends to file a motion for default judgment against the Entity Defendants pursuant to Fed. R. Civ. P. 55(b)(2) and Local Civil Rule 55.2(b) by **Friday, July 17, 2020**. Plaintiff's affidavit of service would be filed on or before **Friday, July 31, 2020** in accordance with Your Honor's Emergency Rule 5.E. Defendants' response would also be due on or before **Friday, July 31, 2020**. Plaintiff's reply, if any, would be due on or before **Friday, August 7, 2020**.

**B. Plaintiff's Motion for Summary Judgment**

As discussed before Magistrate Judge Cave during the June 17, 2020 telephone conference in this matter, Plaintiff intends to file a motion for summary judgment against Defendant Oskouie who is not in default and is proceeding *pro se*. Plaintiff proposes that its motion for summary judgment and all supporting material be due by **Friday, July 31, 2020**. Defendant Oskouie's response would then be due by **Friday, August 14, 2020** with Plaintiff's reply, if any, due by **Friday, August 21, 2020**.

Dated: June 30, 2020

Respectfully submitted,

The parties' proposed briefing schedule is adopted, except that the Entity Defendants shall file their responses, if any, to Plaintiff's motion for default judgment within **two weeks** from the date of service, and Plaintiff shall file its reply, if any, within **one week**. Plaintiff shall serve the Entity Defendants with a copy of this Order, in addition to its motion for default judgment and any supporting papers.

SO ORDERED.



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Hon. Ronnie Abrams  
7/1/2020

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*Defendant and Counterclaimant*