

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

BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and
PLATINUM AVENUE HOLDINGS PTY,
LTD,

Defendants.

Case No. 1:17-cv-01889-RA

MILAD OSKOUIE and PLATINUM AVENUE
HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and
BRANDON MADDOX,

Counterdefendants.

**CERTIFICATION OF MILAD OSKOUIE IN SUPPORT OF MOTION FOR A SIX
MONTH STAY OF THE ACTION**

MILAD OSKOUIE, under the penalties of perjury, affirms as follows:

1. I am a defendant in this action. I make this certification in support of Defendants' motion to stay this action for six months. I am fully familiar with the facts and circumstances had herein.
2. I have been diagnosed with Stage B Leukemia. I take up to six pills a day and have periodic migraines, headaches, bouts of extreme exhaustion and memory loss due to both my

treatment and the illness. My doctor has recommended that I not involve myself in anything strenuous or that require concentration for six months.

3. I have seen the documents Plaintiff placed into evidence in opposition to this motion. They are false, misleading, forged and false.
4. First, Mr. Mohammad Mahdi is not an attorney, as he claims, and may not be located in Iran. Annexed as Exhibit A hereto are exchanges I had with him on a service called Upwork used for hiring people on a per job basis. It indicates his location is in Pakistan and is a graphic designer and researcher. His phone number is attached to a Facebook page which lists his location in Qom, Iran. In no location does he state he is an attorney or attended law school.
5. Next, annexed as Exhibit B hereto are translated copies of pages 8 and 12 of Mr. Mahdi's certification. The translation indicates that, while the letter itself is dated January 6, 2018 the translator certification is dated in 1990. Further, the address of the purported translator is Teheran, Iran. Thus, the certification that the translation is accurate could not possibly be from the letter. The letter also uses a telephone numbering on the document also uses a telephone numbering system not used since the mid-1980s.
6. Lastly, the letter is dated prior to the date Defendants' informed Plaintiff that he had Leukemia or provided my doctor's name and location.
7. If the Court wishes, I will be happy to, under seal, provide test results demonstrating that I have Leukemia.
8. I have also requested from the medical board confirmation of the Doctor's license and will provide it when I receive it.

9. I have also received verbal confirmation from the Iranian Association of Certified Translators and Interpreters (IACTI) that the documents provided are forgeries and have lodged a written request for confirmation. I will provide it when I receive it.
10. I respectfully request that the motion be granted in full.

DATED: Teheran, Iran
February 13, 2018



Milad Oskouie