

**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 AMIR JAAFARI IN SUPPORT OF MOTION FOR A SIX
MONTH STAY OF THE ACTION**

AMIR JAAFARI, under the penalties of perjury, affirms as follows:

1. I am an individual with no relation to this action. I am in the banking and finance industry in Iran and frequently work with and exchange documents with the Iranian government. I am fully familiar with the form and format of Iranian governmental documents and letters.
2. I have seen the documents Plaintiff placed into evidence in opposition to this motion. They are false, misleading, forged and false.

3. Page eight of the certification of Mohammed Mahdi is in a form the Iranian government would never use. It contains both Latin lettering and Persian lettering. Iranian documents do not use Latin lettering at all. Annexed as Exhibit A hereto is a highlighted example, in circle number 1. In addition, neither the author and his position are not identified, nor does it identify the recipient, another breach of the form used by the Iranian government Exhibit A, Circles 2, 3). According to the website of the Iranian Medical Council, he is in charge of procurement for the Council, and thus is unlikely to be responding to such a request. See, <http://irmc.org/DynamicContent.aspx?mi=9d07bbb9-8d71-4840-87ba-0a2dfeba152b&ci=95bd5992-fad5-46f6-9ef8-75defed9e89a>.
4. Further, the official legal certification stamp, required under Iranian law, is missing (Exhibit A, Circle 4). Thus, this, by itself, makes the document invalid.
5. The document also lacks the certification required by translators. Annexed as Exhibit B hereto is an example.
6. Lastly, the footer is not straight, indicating it may have been “photoshopped” or altered in some fashion (Exhibit A, Circle 5).
7. I respectfully request that the motion be granted in full.

DATED: Teheran, Iran
February 14, 2018

امیر جعفری

Amir Jaafari