

**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 RENEWED 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 and the primary officer for the other defendants. I am fully familiar with the facts and circumstances set forth herein and with the form and format of Iranian governmental documents and letters.
2. Currently, I take sixteen pills a day and have headaches, memory loss, migraine headaches, and periodic extreme exhaustion during the course of the day due to my illness.

3. Annexed as Exhibit A hereto is a letter from my doctor attesting to the fact that I have Stage B leukemia and require a six month stay.
4. Annexed as Exhibit B hereto is a copy of my doctor's license and a translation thereof.
5. I am a citizen of Iran, where I was born, and Australia. Over the last several years, I have travelled and stayed at my residences in the United Kingdom and Teheran, Iran. While staying in my residence in late October Iran in 2017, I became ill. I therefore went to the doctor I have in Iran. He diagnosed me with Stage B leukemia.
6. The documents annexed as Exhibit B to the Mohammed Mahdi certification dated February 7, 2018 purporting to claim that my doctor is not a doctor are fraudulent. First, the original copy of the letter in Persian is from a date prior to the date my counsel informed Plaintiff's counsel of my illness. The certified translation of Exhibit B of Mahdi's declaration shows the date of the letter being the sixth of January this year. I had not informed Plaintiff or its counsel of my illness up until the seventeenth of January this year. Thus, they could not possibly have sought such letter on or prior to that date simply because they did not know prior to that date. Paragraph 3 of Mahdi's declaration falsely states that page eight of his Exhibit B is dated in February when in fact the original letter in Persian on page 8 of 12 is dated in January, as confirmed by my certified translation. It follows that page 9 of 12 of Mahdi's declaration cannot be an accurate or true translation since page 8 of 12 on the previous page was dated in January.
7. Further, Mahdi contends that he has a degree in law. In fact, he is a temporary resident in Iran and is not an official translator: see <http://ekfam.ir/Default.aspx?tabid=293>. The website is only accessible in Iran.

8. The letter he provided that purports to be from the Iranian Association of Official Translators contains a telephone number in a form that has not been used in over 30 years in Iran since it only has six digits and not eight: See: https://en.wikipedia.org/wiki/Telephone_numbers_in_Iran.
9. Annexed as Exhibit C hereto are certified translations of Pages 8 and 12 of the Mahdi Certification. Those translations demonstrate clearly that the purported translation certificate attesting to the translation of the documents in Exhibit B to his Certification are dated as of 1990. Thus, they could not be from the documents they are attesting to but must have been taken from another document prepared in 1990. In addition, it would not be possible for Mahdi to even be a translator since that time since he was not born. He was born in 1996: see his Passport, annexed as Exhibit D. Furthermore, the address on the false Iranian Association of Translators does not exist. Moreover, his name is different in the false Iranian Association of Translators document. It is "Mohammed Ali Mehdi". See certified translation of the False "Iranian Association of Translators" document, Exhibit E
10. I hired Mahdi for a project on Upwork.com and learned he may be located in Pakistan and is not an attorney nor an official translator. Annexed as Exhibit F hereto are the documents demonstrating this. Thus, it is not clear that he would be able to obtain this information. This Mahdi is the same Mahdi that Brandon hired.
11. Lastly, I have repeatedly contacted my doctor through the telephone number at the top and bottom of his letter. Despite Mohammed's false statement that the telephone connects to Atlastech Co, it does in fact connect to the medical office. I have been told by his office staff that a person referring to himself as "Mohammad" has called his office asking questions about me.

12. Paragraph 5 of Mahdi's declaration is false. The address and unit number listed on my medical certificate does in fact exist. The Atlas Tech company has nothing to do with the address listed on the doctor's address. Neither their listed telephone or address are identical. Their offices are miles and miles apart. <http://www.atlastec.co/en/contactus>. Their address and telephone number is listed as: No 2, 6th St, Ahmad Ghasir (Bokharest) St, Tehran, Iran; 82477-021

13. I respectfully request that this motion be granted in full

DATED: Teheran, Iran
March 14, 2018



Milad Oskouie