

**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 SAUL ROFFE, ESQ. IN SUPPORT OF RENEWED MOTION
FOR A SIX MONTH STAY OF THE ACTION**

SAUL ROFFE, under the penalties of perjury, affirms as follows:

1. I am an attorney licensed to practice law in the states of New York and New Jersey and before this Court. I make this certification in support of Defendants' motion for a stay of this action. I am fully familiar with the facts and circumstances had herein.
2. On January 17, I indicated to Plaintiff's counsel that I would be seeking a stay of this action and sought agreement in order to avoid motion practice. Plaintiff's counsel indicated he would not agree to the stay and that he did not see why the diagnosis would matter.

Annexed as Exhibit A hereto are copies of the emails by and between me and Plaintiff's counsel on that evening. I did not disclose the name of the doctor until the instant motion was filed on February 1, 2018.

3. I respectfully request that the motion be granted in full.

DATED: Marlboro, NJ
March 14, 2018



Saul Roffe