

**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 herein and with the form and format of Iranian governmental documents and letters.
2. In late February, I contacted the office of my doctor, Dr. Yavari Nasab and requested a copy of my leukemia test results to provide to this Court.

3. Subsequently, I received documents including the results I provided to the Court and was told those were the results by the doctor's receptionist.
4. On March 27, 2018, after learning the results were from a text, I reached out to Dr. Nasab again. He looked into it and indicated to me that his staff made an error. Instead of providing my results, his staff provided a typed description of leukemia he uses to describe the illness to patients. He said he they were concerned about letting the actual results out because they were getting threatening calls daily regarding these results, and thus were reluctant to release them, as I have earlier outlined to the court.
5. Dr. Nasab has indicated that he is willing to appear for a video conference deposition do describe these events and my illness.
6. I respectfully request that the extension be granted.

Dated: Teheran, Iran

March 28, 2018



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Milad Oskouie