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LAW OFFICES OF SAUL ROFFE, ESQ., P.C.
52 HOMESTEAD CIRCLE
MARLBORO, NEW JERSEY 07746
(732) 616-1304
saulroffe@roffelaw.com

Licensed in New York and New Jersey

March 27, 2018

United States Magistrate Judge Henry Pitman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*APPLICATION DENIED. THE
REASONS PROFFERED FOR THE
REQUEST ARE ~~THEY~~ NOT
CREDIBLE.*

SO ORDERED

Henry Pitman
HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE
3-28-18

Re: BMaddox Enterprises LLC v. Oskouie, et. al. 17 Cv. 1889 (RA)

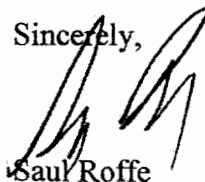
Dear Judge Pitman,

I am writing to request a three-week extension on Defendants' renewed motion for a stay in order to schedule and take the deposition of Defendant Oskouie's doctor via video conferencing. As the attached Certification of Mr. Oskouie demonstrates, it appears that, rather than send Oskouie his test results, they send their general information packet on leukemia and told him it was something else. According to the Doctor, his staff was concerned about sending out the actual results because they were getting threatening calls regarding Mr. Oskouie and these results. We would like the doctor to testify as to these events and all aspects of his cancer, including, if needed, how he came to the diagnosis. This deposition will clarify all the issues concerning Oskouie's illness, request for an extension, and demonstrate he did not knowingly put false information in front of the Court, and that his statements concerning his cancer are true.

Unlike Plaintiff, who have yet to retract the fraudulent affidavit they put in on the prior

motion for a stay, or even acknowledge its falsity, Oskouie wishes to clarify the evidence and provide all relevant information to the Court. Plaintiff has opposed this extension.

Sincerely,

A handwritten signature in black ink, appearing to read 'Saul Roffe', written over the printed name.

Saul Roffe

**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. 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



Milad Oskouie