

**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.
2. On March 6, 2018, through my New York counsel, I received a settlement offer from John Di Giacomo on the default judgment his firm obtained in Michigan against me. I did not contest that matter because it would have been too expensive to fight two litigations in separate parts of the United States for me, among other things. I did not take the offer

seriously and called to joke about it with him the next day, March 7, 2018. I offered, on that call and through counsel, to fly him to Iran to discuss the matter, again jokingly. Mr. Di Giacomo said he would love to take the trip. He indicated that he was going to take all my assets and I said he would have to try harder to intimidate me. We also discussed the false certification Plaintiff put in in this action regarding my doctor and said that it's interesting that he found out that my doctor was not a doctor in the 1990's, probably before he was even born. I do not know his birthday or age and never claimed to. At no point was the conversation ever serious, at least on my part.

3. Annexed as Exhibit A hereto are emails with the United Kingdom police regarding a complaint I filed for harassment when someone mailed me a bullet. I do not know who sent it. I have never been arrested or charged by the police in any country, including the United Kingdom, although it is my understanding a member of a white supremacist group was arrested on this matter.
4. Annexed as Exhibit B hereto is a copy of a letter Plaintiff sent to my family. Although it does not, on its face, contain threatening language, my parents felt threatened by it.
5. I have been, over the course of this action, been in contact with S.A. Matt Miller of the FBI. Annexed as Exhibit C hereto are emails demonstrating S.A. Miller's contact with me and that he believes Plaintiff is hacking my site and using "cutouts" for threatening me, although he does not believe the case would succeed if prosecuted.
6. Annexed as Exhibit D hereto are screenshots sent to me by S.A. Miller. I cannot annex the original emails they came with because that email account has been closed, but I received them from him.

7. Annexed as Exhibit E hereto is a copy of a website put up by Plaintiff accusing me of being a crook, hacker and other things.
8. Annexed as Exhibit F are threatening emails I received from “spiketheworld” regarding this matter.
9. I respectfully request that the motion be denied in full and the cross-motion be granted in full.

Dated: Teheran, Iran
March 29, 2018

A handwritten signature in black ink, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

Milad Oskouie