

**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 YAVARI NASAB, M.D. IN FURTHER SUPPORT OF MOTION  
FOR A SIX MONTH STAY OF THE ACTION**

**YAVARI NASAB**, under the penalties of perjury, affirms as follows:

1. I am an oncologist licensed to practice medicine in Iran. I am the primary treating physician of Milad Oskouie relating to his leukemia. I make this certification in further support of Defendants' motion for a six month stay of the action. I am fully familiar with the facts and circumstances had herein.
2. I have diagnosed Oskouie with Stage B leukemia. Beginning on approximately February 6, 2018, my office began receiving telephone calls between the hours of 6:00 A.M. until 11:00 A.M. from a man claiming to be Brandon Maddox on a daily or near daily basis.

This gentleman asked that we provide him with a statement falsely stating that Oskouie does not have leukemia. In addition, we also repeatedly received telephone calls from a Mr. Mahdi. Mahdi threatened my staff by stating that Mr. Maddox had many friends in law enforcement in the United States, and that, if my office did not supply the false statement Maddox requested, Maddox would have family members of my staff in the United States arrested. Mahdi also falsely claimed he was authorized to obtain the statement Mr. Maddox requested. As a result, we provided extra protection for Oskouie's records, were extremely careful with them, and put restrictions on releasing them to anyone.

3. In March, Oskouie requested a copy of his records. However, given these calls, my staff was very suspicious of the request, and, since March is a holiday period in Iran, and I was not always in the office during that period. They could not understand why he would need them during that period.
4. Later, I spoke to Oskouie and confirmed his request. However, my staff was still nervous about everything that was happening and was extremely concerned about releasing his records.
5. As a result, instead of sending Oskouie his actual results, my assistant sent results copied from another source we use to describe what leukemia results look like to patients, as a comparison to their results.
6. When I learned about this from Oskouie, I spoke to my assistant. She indicated that, because of all the threats and calls, she was nervous about sending out anything related to Oskouie or his results. She therefore, sent those instead because she did not understand the importance of them and was extremely concerned about releasing any information concerning Mr. Oskouie.

7. I will be happy to provide video testimony about these events and Mr. Oskouie's illness.

DATED: Teheran, Iran  
April 1, 2018

  
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Yavari Nasab