

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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BMADDOX ENTERPRISES LLC,

Plaintiff,

v.

MILAD OSKOUIE, OSKO M LTD, and  
PLATINUM AVENUE HOLDINGS PTY, LTD,

Defendants.

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MILAD OSKOUIE and PLATINUM AVENUE  
HOLDINGS PTY, LTD,

Counterclaim Plaintiffs,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterclaim Defendants.

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Case No. 17-cv-1889-RA-HBP

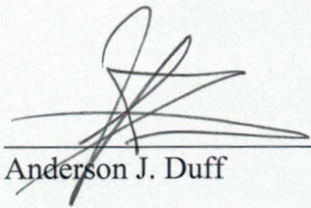
**FIFTH DECLARATION OF ANDERSON J. DUFF**

I, Anderson J. Duff, state the following:

1. I am an attorney admitted to practice before the Southern District of New York.
2. I represent Plaintiff and Counterclaim Defendant BMaddox Enterprises LLC and Counterclaim Defendant Brandon Maddox in the above-captioned matter.
3. My colleagues and I first learned of Defendants' motion for sanctions under Rule 11 of the Fed. R. Civ. P. on March 29, 2018 when it was filed with the Court. (Defs.' Mot. Sanctions, ECF No. 128.)
4. Since Defendants' memorandum in support of their renewed motion for a stay, which not only describes Defendant Oskouie hiring Mohammed Mahdi under false pretenses, Oskouie Decl. Ex. F, ECF No. 118-6, but also included images of Mahdi's passport, Oskouie Decl. Ex. E, ECF No. 118-5, Mahdi has not responded to attempts to contact him in relation to this case.
5. I am currently attempting to work with an independent third party to verify the substantive information in the Mahdi Declaration.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Date: New York, New York  
April 5, 2018

By:   
Anderson J. Duff