

**LAW OFFICES OF SAUL ROFFE, ESQ., P.C.**

52 HOMESTEAD CIRCLE  
MARLBORO, NEW JERSEY 07746  
(732) 616-1304

Licensed in New York and New Jersey

saulroffe@roffelaw.com

April 20, 2018

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

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

Dear Judge Pitman,

This letter is in response to Plaintiff's letter dated April 18, 2018. Plaintiff's certification should not be accepted by this Court. First and foremost, Defendants were clear in their Memorandum of Law in Opposition to Plaintiff's Motion for Sanctions and in Support of Defendants' Motion for Sanctions that Defendants were seeking sanctions or an order directing Plaintiff to stop harassing Defendants and the people around him. Indeed, Defendants provided as exhibits numerous documents concerning the harassment, and are continuing to receive such documents, as evidenced by their most recent filing. Defendants' discussed Plaintiff's false filing only to demonstrate that both parties have been guilty of erroneous filings, although Defendants have admitted to their error, unlike Plaintiff. Then, Defendants described in detail the harassment suffered. Defendants did place into evidence documents previously before this Court to demonstrate the ongoing and continuing nature of the harassment.

Next, the Certification of Plaintiff adds nothing, except to highlight the depths Plaintiff will go to attack Defendants. In fact, despite claiming “upon information and belief” that the letters were forgeries, without providing any basis for same. If Plaintiff wished to dispute the letters, he should have when responding to the motion. At the least, he should have provided the basis for his “information and belief.”

Plaintiff has been placing letters such as these, although not as threatening, on the internet at the miladoskouie.com website he operates. Right now, as we speak, the letter dated May 19, 2017, which he identifies as “Letter to Hacker’s Family II” currently on that website. Since he refers to it as letter II, there must have been a previous letter posted. Obviously, Plaintiff has been writing to Oskouie’s family, and even places the least threatening of the letters on his web site. Even then, the current letter says, “this is not going to end well” and, “...are going to negatively impact your entire family.” Annexed hereto are screenshots I took as of this date. There is simply no reason for Plaintiff to repeatedly contact Oskouie’s family or his doctor repeatedly. He should be ordered to stop it. Similarly, his certification should not be added to this record.

Sincerely,



Saul Roffe