

**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.: 17-cv-1889-RA-HBP

MILAD OSKOUIE and PLATINUM AVENUE  
HOLDINGS PTY, LTD,

Counterclaim Plaintiffs,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterclaim Defendants.

**DECLARATION OF EHSAN HOSSEINZADEH**

I, EHSAN HOSSEINZADEH, state as follows:

1. I am citizen of and reside in the Islamic Republic of Iran.
2. I am a certified lawyer with license No. 24362 issued by Iranian Central Bar.
3. I am managing director of Educated Lawyers law firm with registration No. 770.
4. Educated Lawyers firm is located at Unit.5, No.9, 3rd Jahad St. Kamali Blvd. Poonak, Tehran, Iran.

5. Our law firm is listed by the British Embassy in Tehran as a "recommended" firm in Tehran, Iran. We are often involved in reviewing government documents for authenticity.
6. I was hired by Brandon Maddox to review the authenticity of two documents reportedly originating from Iran. Document 90-1 "Doctor's Letter" and Document 118-2 "Doctor's Medical License".
7. On or about April 26, 2018, I went to the Iranian Medical Council ("IMC") located at No. 119, Farshi Moghadam St (16<sup>th</sup> St), North Kargar Ave, Tehran, Iran. After asking Mr. Zahiri who was employee of License Issuance Department of IMC and Mr. Mahdizadeh who was employee of Registration Department of IMC about Ali Reza Yavari Nasab's medical license, they told me this person is not a doctor and he does not have a valid medical license. The maximum medical license number is in the 200,000 range and has not reached 600,000, so the alleged Doctor's Medical License No. 671239 is not real.
8. On or about April 26, 2018, I visited the location mentioned on Ali Reza Yavari Nasab's medical letterhead. I declare that, not even there was a medical clinic at mentioned address but also alleged address (Unit.4, No.31, Morghab St. Hoveyzeh St. North Sohrevardi St., Tehran, Iran) was completely fake. There was no No.31 on Morghab Street.
9. On or about April 26, 2018, I called the phone number on the letterhead appearing on the Doctor's Letter (00982188738961) and an answering machine identified the AsanFekr Elevator Company.
10. Based on my professional experience and investigation, I believe that the Doctor's Letter and Doctor's Medical License are forgeries.

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

Date: Tehran, Iran  
May 1, 2018

By: Ehsan Hosseinzadeh  
EHSAN HOSSEINZADEH

