



R E V I S I O N / L E G A L

Doing business as The Law Offices of Anderson J. Duff in the State of New York

244 Fifth Avenue, Suite 2230, New York, NY 10001

855.473.8474 / revisionlegal.com

May 1, 2018

VIA ECF

United States Magistrate Judge Pitman
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

RE: *BMaddox Enterprises LLC v. Milad Oskouie, et al.*, 17-cv-1889-RA-HBP
Supplemental Declaration in Opposition to Defendants' Request for a Stay

Dear Magistrate Judge Pitman:

On February 9, 2018, Plaintiff filed its opposition to Defendant's Motion for a Six Month Stay of the proceedings. (Pl.'s Mem. Opp'n Mot. Stay, ECF No. 93.) In support of Plaintiff's memorandum, Plaintiff filed the declaration of Mohammad Mahdi, which in its key points stated that Mahdi had tried to verify that Defendant Oskouie's doctor in Iran was legitimate, but instead found that: (1) the address in the doctor's letterhead did not exist; (2) no oncologist named Ali Reza Yavari Nasab with medical code 671239 was on record; (3) and the phone number in the doctor's letterhead reached AtlasTech Co., which is an elevator repair company. (Mahdi Decl. 3-5, ECF No. 95.)

Although it was difficult to find a reliable source who could visit Iran and was willing to have their name associated with this case, we have done so. Attached is a declaration from a lawyer working in Iran who verified the substance of the Mahdi Declaration.

BMaddox respectfully requests that the Court accept BMaddox's submission of the attached declaration.

Respectfully submitted,

Anderson J. Duff

AJD/rr
Encl.