

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

|                                    |   |                            |
|------------------------------------|---|----------------------------|
| _____                              | ) |                            |
| BMADDOX ENTERPRISES LLC,           | ) |                            |
|                                    | ) |                            |
| Plaintiff,                         | ) | Case No. 17-cv-1889-RA-HBP |
|                                    | ) |                            |
| v.                                 | ) |                            |
|                                    | ) |                            |
| MILAD OSKOUIE, OSKO M LTD, and     | ) |                            |
| PLATINUM AVENUE HOLDINGS PTY, LTD, | ) |                            |
|                                    | ) |                            |
| Defendants.                        | ) |                            |
| _____                              | ) |                            |
| MILAD OSKOUIE and PLATINUM AVENUE  | ) |                            |
| HOLDINGS PTY, LTD,                 | ) |                            |
|                                    | ) |                            |
| Counterclaim Plaintiffs,           | ) |                            |
|                                    | ) |                            |
| v.                                 | ) |                            |
|                                    | ) |                            |
| BMADDOX ENTERPRISES LLC and        | ) |                            |
| BRANDON MADDOX,                    | ) |                            |
|                                    | ) |                            |
| Counterclaim Defendants.           | ) |                            |
| _____                              | ) |                            |

**DECLARATION OF ANDERSON J. DUFF**

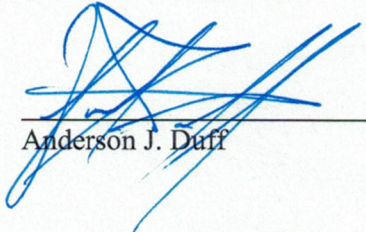
I, Anderson J. Duff, state the following:

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. I have personally reviewed all of the documents produced by Defendants in response to Plaintiff's interrogatories and requests for the production of documents and things, and I am familiar with Defendants' production.
4. After comparing the first documents produced by Defendants with the one hundred ninety-two pages produced after in accordance with the Court's March 6, 2018 Order, ECF No. 111, I have determined that all but forty-four of the pages most recently produced were included as standalone items in Defendants' initial production.
5. In many instances, documents that were produced for a second time have images or letters that are cut off by the edge of the document in the exact same manner.
6. I have personally saved at least two versions of Defendants' Infringing Website, <FFLTrust.com>, that list Defendant Osko M. Ltd. as the copyright owner for the website.
7. Defendants' production of documents does not include copies of Defendants' website as requested by Plaintiff.
8. There are differences between the Federal Firearms Licensing Guide produced by Defendants' and the copy that I acquired before the start of discovery.
9. Defendants' unwillingness to comply with their discovery obligations is jeopardizing the Plaintiff's rights.

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  
May 16, 2018

By:



Anderson J. Duff