

**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,)	
)	
Counterclaimants,)	
)	
v.)	
)	
BMADDOX ENTERPRISES LLC and)	
BRANDON MADDOX,)	
)	
Counterclaim Defendants.)	
_____)	

**PLAINTIFF AND COUNTERCLAIM DEFENDANTS’ MOTION FOR
SANCTIONS AGAINST DEFENDANTS AND COUNTERCLAIMANTS
PURSUANT TO FED. R. CIV. P. 11**

PLEASE TAKE NOTICE THAT the undersigned attorneys for Plaintiff BMaddox Enterprises LLC (“BMaddox”) and Counterclaim Defendants BMaddox and Brandon Maddox (together “Counterclaim Defendants”) will move before the Honorable Ronnie Abrams, United States District Court Judge for the Southern District of New York, at 40 Foley Square, New

York, New York for: (a) an Order granting Plaintiff and Counterclaim Defendants' Motion for Sanctions Against Defendants and Counterclaimants Pursuant to Fed. R. Civ. P. 11 (the "Motion"); (b) monetary damages levied against Defendants; (c) an award of attorneys' fees and costs to Plaintiff; and (d) such other relief as this Court may deem just and proper.

This Motion will be supported by an accompanying, detailed memorandum of law, accompanying exhibits, the current record, and such additional documentary evidence or declarations as may be received prior to a hearing on this Motion.

This Motion is necessary because the Defendants will not stop making meritless arguments before the Court. As the memorandum in support of this Motion will describe in no uncertain terms, Defendants and their counsel have repeatedly violated the duties imposed on them by Fed. R. Civ. P. 11(b). Generally, the following facts demonstrate these repeated violations:

1. Defendants have twice moved for a six-month stay of the proceedings on nearly identical grounds, namely, that Defendant Oskouie has leukemia, without addressing the underlying legal argument as to whether a stay is appropriate.
2. When caught submitting fraudulent documents that Defendants claimed were test results, Defendants concocted an explanation that is meritless on its face.
3. Defendants have filed a meritless motion for sanctions pursuant to Rule 11 without following the procedure in Rule 11 of the Fed. R. Civ. P.
4. Defendants submitted entirely irrelevant police reports to attack Plaintiff's counsel.
5. Defendants have grossly mischaracterized emails between Defendant Oskouie and an FBI agent.
6. Defendants have grossly mischaracterized screenshots of an online conversation in stating that the screenshots show that Brandon Maddox was conspiring to make it look as though Defendant Oskouie was harassing the Plaintiff.

7. Defendants and Counterclaimants have lied in their pleadings and other filings to harass Plaintiff and Counterclaim Defendants. This harassment has caused and continues to cause significant waste of judicial resources and great expense to Plaintiff and Counterclaim Defendants.
8. At the time of each filing made by or on behalf of Defendants or Counterclaimants, a reasonable inquiry under the circumstances would have shown that each filing was factually without foundation, without evidentiary support, and was objectively unreasonable.

Counsel for Plaintiff and Counterclaim Defendants served this Motion on counsel for Defendants and Counterclaimants at least twenty-one (21) days prior to its filing in accordance with Fed. R. Civ. P. 11(c)(2) to promote judicial efficiency by allowing Defendants and Counterclaimants to significantly narrow the issues before this Court by amending their filings to comport with the evidence of record, information within their possession, custody, or control, and objectively reasonable interpretations of the law.

Dated: New York, New York
June 18, 2018

Respectfully submitted,

REVISION LEGAL, PLLC
*Attorneys for Plaintiff and
Counterclaim Defendants*

By: /s/ Anderson J. Duff

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