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**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. 1:17-cv-01889-RA-HBP

**NOTICE OF MOTION**

MILAD OSKOUIE and PLATINUM AVENUE  
HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and  
BRANDON MADDOX,

Counterdefendants.

**MOTION TO DISSOLVE OR MODIFY  
THE *EX PARTE* ASSET RESTRAINING ORDER**

PLEASE TAKE NOTICE that, upon the Declaration of Milad Oskouie dated August 16, 2017, and the accompanying memorandum of law, and upon all pleadings and papers

previously filed herein, Defendants Milad Oskouie (“Mr. Oskouie”), Osko M Ltd (“OML”) and Platinum Avenue Holdings Pty, Ltd. (“Platinum,” collectively with Mr. Oskouie and OML, “Defendants”), having been served with a temporary restraining order without prior notice or hearing, by their attorneys, Lewis & Lin LLC, will move this Court under Fed. R. Civ. P. 65(b) to dissolve or modify the portion of the *ex parte* temporary restraining order issued by this Court on May 30, 2017 granting Plaintiff BMaddox Enterprises, LLC’s (“BME’s”) request to restrain all of the Defendants’ assets pending a hearing on BME’s request for a preliminary injunction (ECF Doc. 15, the “Asset Restraining Order”).

Pursuant to Federal Rule of Civil Procedure 65(b)(4), Defendants respectfully request that this motion be heard on two days’ notice, or sooner, as the Court’s calendar permits. Should the Court schedule a later return date, Defendants request the opportunity to file reply papers.

DATED this 16<sup>th</sup> day of August 2017,

Respectfully Submitted:

LEWIS & LIN, LLC

By: /s/ David D. Lin  
David D. Lin, Esq.  
Justin Mercer, Esq.

*Attorneys for Defendants/Counterclaimants*