

**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

MILAD OSKOUIE and PLATINUM AVENUE
HOLDINGS PTY, LTD,

Counterclaimants,

v.

BMADDOX ENTERPRISES LLC and
BRANDON MADDOX,

Counterdefendants.


**CERTIFICATION OF SAUL ROFFE, ESQ. IN SUPPORT OF MOTION FOR A SIX
MONTH STAY OF THE ACTION**

SAUL ROFFE, under the penalties of perjury, affirms as follows:

1. I am an attorney licensed to practice law in the states of New York and New Jersey and before this Court. I make this certification in support of Defendants' substitution of counsel in this matter. I am fully familiar with the facts and circumstances had herein.
2. Annexed as Exhibit A hereto is a letter from the physician of Defendant Oskouie indicating that he has Stage B Leukemia and requires six months for treatment and requests a stay for that purpose.

3. Annexed as Exhibit B hereto is information from the American Cancer Society website describing Stage B Leukemia.
4. Annexed as Exhibit C hereto is information from the National Institutes of Health website describing the symptoms of Stage B Leukemia.
5. Annexed as Exhibit D hereto is information from the American Cancer Society describing the treatment for Stage B Leukemia.
6. On January 17, 2018, I exchanged emails with Anderson Duff, counsel for Plaintiff, and he did not agree to the entry of the stay sought herein.
7. There is no prejudice to Plaintiffs due to the delay sought, and without the delay, Defendants will not be able to adequately participate in defending themselves and pursuing their counterclaims.
8. I respectfully request that the motion be granted in full.

DATED: Marlboro, NJ
February 1, 2018



Saul Roffe