

SECOND DECLARATION OF BRANDON MADDOX

I, Brandon Maddox, state as follows:

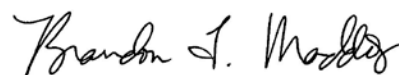
1. I am the owner of BMaddox Enterprises LLC (“BMaddox”).
2. After reviewing the doctor’s note submitted in the above-captioned matter as Exhibit A attached to the Certification of Saul Roffe, Esq. in Support of Motion for a Six Month Stay of the Action (ECF 90-1) (the “Doctor’s Note”), I posted a job listing online looking for a freelancer to translate the letter and confirm the authenticity of the Doctor’s Note.
3. I hired Mohammad Mahdi as a result of the job posting in part because he advertised more than three (3) years of translation experience with several languages, including English, Arabic, Farsi, Urdu, and Persian.
4. I have reviewed the declaration signed by Mohammad Mahdi, and the information contained therein accurately states the information conveyed to me by Mahdi.
5. I have no reason to doubt the veracity of the information conveyed to me by Mahdi and contained in Mahdi’s declaration.
6. Because I was concerned about hiring someone to investigate the veracity of the Doctor’s Note, I informed a local agent at the Federal Bureau of Investigation, Matthew J. Miller, that I had done so.
7. I did not instruct Mahdi to ask about any privileged information, I hired him merely to determine whether the Doctor’s Note was real.
8. Mahdi is the only person who called the phone number in the letter head of the Doctor’s Note.

9. Aside from my discussions with Agent Miller, my attorneys, and Mahdi, I have not made any public statements concerning the Doctor's Note, Oskouie's asserted illness, or Oskouie's doctor.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Date: New York, New York
February 8, 2018

By:



Brandon L. Maddox