

STATE OF MICHIGAN
IN THE 13th CIRCUIT COURT FOR THE
COUNTY OF GRAND TRAVERSE

_____)
 REVISION LEGAL, PLLC, a professional)
 limited liability company, and)
 ANDERSON J. DUFF, an individual,)
 Plaintiffs,)
 v.)
 MILAD OSKOUIE, an individual, and)
 JOHN DOES 1-10, individuals,)
 Defendants.)
 _____)
 John Di Giacomo (P73056))
 REVISION LEGAL, PLLC)
 Attorneys for Plaintiffs)
 109 E. Front St.)
 Suite 309)
 Traverse City, Michigan 49684)
 (t) 231.714.0100)
 (f) 231.714.0200)
 _____)

Case No.: 17-32312-CZ
Hon. Thomas Power
**[PROPOSED] FORM OF
DEFAULT JUDGMENT**

This Court, having reviewed the pleadings, Plaintiffs’ Motion for Entry of Default Judgment, the declaration submitted in support of that motion, any opposition papers submitted by Defendant, Milad Oskouie (“Oskouie”), any reply or surreply papers, and all other materials submitted to the Court, and good cause appearing therefore:

It is **ORDERED, ADJUDGED, AND DECREED** as follows:

1. Plaintiffs’ Motion for Entry of Default Judgment is hereby **GRANTED**.
2. Oskouie or unknown third parties under Oskouie’s control unlawfully and willfully published unprivileged statements with actual malice constituting defamation and defamation *per se*.

3. Oskouie or unknown third parties under Oskouie's control have unlawfully and willfully published unprivileged statements constituting false light invasion of privacy.

4. Oskouie conspired with unknown third parties to unlawfully steal login credentials from attorneys at Revision Legal, PLLC, post defamatory statements on a variety of third-party websites, and post statements constituting false light invasion of privacy on a variety of third-party websites.

5. Oskouie and unknown third parties took such action intending to disrupt Plaintiffs' representation of a party adverse to Oskouie in an unrelated cases pending before the United States District Court for the Southern District of New York.

6. The court finds that this is an exceptional case.

7. Defendant Oskouie and any agents, servants, employees, attorneys, and other persons in active concert or participation with him are permanently enjoined and restrained from:

- a. contacting Plaintiffs or any of their employees, clients, prospective clients, family members, agents, representatives, successors, or assigns;
- b. posting further defamatory statements concerning Plaintiffs or any of their employees, clients, prospective clients, family members, agents, representatives, successors, or assigns;
- c. posting further statements constituting an invasion of privacy concerning Plaintiffs or any of their employees, clients, prospective clients, family members, agents, representatives, successors, or assigns; and
- d. posting any statements concerning Plaintiffs or any of their employees, clients, prospective clients, family members, agents, representatives, successors, or assigns.

8. Defendant Oskouie shall pay Plaintiffs' reasonable costs and attorneys' fees in the amount of twenty-eight thousand dollars (\$28,000).

9. Defendant Oskouie shall pay Plaintiffs three hundred thousand dollars (\$300,000) in presumed damages for Plaintiffs' claim sounding in defamation.

10. Defendant Oskouie shall pay Plaintiffs fifty-thousand dollars (\$50,000) in damages relating to Plaintiffs' invasion of privacy claim.

11. Defendant Oskouie shall pay Plaintiffs twenty-thousand dollars (\$20,000) in damages relating to Plaintiffs' civil conspiracy claim.

12. Google, Lycos, Bing, and any other search engine provider that has indexed any of the links shown in Schedule A shall de-index all of the links shown in Schedule A within two (2) weeks of receipt of this Order.

13. Any website, internet service provider, company, or other entity hosting any of the content found at the links shown in Schedule A shall be removed by the company, website, or internet service provider within two (2) weeks of receipt of this Order.

14. Any website, internet service provider, company, or other entity hosting any of the content found at the links shown in Schedule A shall provide Plaintiffs with any and all identifying information concerning the author of the original post shown in each listing within two (2) weeks of receipt of this Order.

15. This Court shall retain jurisdiction of this matter to enforce this Order.

SO ORDERED

DATED this ___ day of March, 2018

Hour: _____ ET

THIRTEENTH CIRCUIT COURT FOR
THE COUNTY OF GRAND TRAVERSE

By:  3/5/2018

The Honorable Thomas Power

Schedule A

1. <https://medium.com/@streport88/anderson-duff-revision-legal-9791873081cd>
2. <https://www.predatorswatch.com/new-york/anderson-duff-revision-legal/>
3. <https://www.ripoffreport.com/reports/anderson-duff-revision-legal/internet/anderson-duff-revision-legal-anderson-josiah-duff-rip-off-inexperienced-lost-my-money-1401200>
4. <https://revision-legal.pissedconsumer.com/anderson-duff-attorney-lawyer-revision-legal-201709281107431.html>
5. <https://revision-legal.pissedconsumer.com/anderson-duff-revision-legal-burglary-felony-201711291139072.html>
6. <http://www.stdregistry.com/anderson-duff-revision-legal-pedophile.html>
7. <http://www.complaintsbureau.com/anderson-duff-attorney-child-molestor-3271.html>
8. <http://liarsandcheaters.com/anderson-duff-attorney-lawyer-new-york.html>
9. <http://www.blacklistreport.com/2017/09/anderson-duff-child-molestor/>
10. <https://www.yelp.com/biz/federal-emergency-management-agency-washington-2>
11. <http://www.yscam.com/revision-legal-ee>
12. <http://www.stdregistry.com/anderson-duff-revision-legal-homosexual-burglary-felony-child-rapist.html>
13. <http://www.stdregistry.com/anderson-duff-lawyer-homosexual-child-molestor.html>
14. <http://exposehomewreckers.com/anderson-duff-attorney-lawyer-new-york-international/>
15. <https://medium.com/@streport88>
16. https://www.yelp.com/user_details?userid=4TvhnN9u8fTrGcnCCet7UQ
17. <https://www.ripoffreport.com/reports/anderson-duff-lawyer/internet/anderson-duff-lawyer-felony-criminal-record-anderson-josiah-duff-lawyer-with-felony-b-1403961>

18. <http://www.complaintsbureau.com/anderson-duff-attorney-child-molestor-3270.html>
19. <http://www.badbizreport.is/anderson-duff-child-molestor/>
20. <https://www.ripoffreport.com/reports/anderson-duff/new-york-new-york/anderson-duff-anderson-josiah-duff-revision-legal-lack-of-trial-experience-less-than-1432236>