

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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EROS INTERNATIONAL PLC,

Plaintiff,

-against-

MANGROVE PARTNERS, NATHANIEL H. AUGUST,
MANUEL P. ASENSIO, ASENSIO & COMPANY, INC.,
MILL ROCK ADVISORS, INC., GEOINVESTING, LLC,
CHRISTOPHER IRONS, DANIEL E. DAVID, FG
ALPHA MANAGEMENT, LLC, FG ALPHA
ADVISORS, FG ALPHA, L.P., CLARITYSPRING INC.,
CLARITYSPRING SECURITIES LLC, NATHAN Z.
ANDERSON AND JOHN DOES NOS. 1-30,

Defendants.

Index Number 653096/2017

Hon. Eileen Bransten

**AFFIRMATION OF
MICHAEL DE LEEUW IN
SUPPORT OF ORDER TO
SHOW CAUSE BY
DEFENDANTS
GEOINVESTING, LLC,
CHRISTOPHER IRONS,
DANIEL E. DAVID,
FG ALPHA
MANAGEMENT, LLC, FG
ALPHA ADVISORS, AND
FG ALPHA, L.P TO
DISMISS THE COMPLAINT
PURSUANT TO CPLR
3211(a)(1), (7)**

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MICHAEL DE LEEUW, an attorney admitted to practice before the Courts of the State of New York, hereby affirms that the following is true under the penalty of perjury:

- I am a member of the Bar of this State and a partner of the firm of Cozen O'Connor, attorneys for Defendants GeoInvesting, LLC, Christopher Irons, Daniel E. David, FG Alpha Management, LLC, FG Alpha Advisors, and FG Alpha, L.P. (the "**GeoInvesting Defendants**"). I am fully familiar with the facts and proceedings herein.

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2. I respectfully submit this affirmation in support of the GeoInvesting Defendants' Order to Show Cause to Dismiss the Complaint Pursuant to CPLR 3211(a)(1) and (7).

3. Attached hereto as Exhibit 1 is a true and correct copy of a March 8, 2017, article by FG Alpha Management for GeoInvesting, LLC titled "*Former Eros Co-Producer Accuses Company of 'Channeling' Money to Family Members.*"

4. Attached hereto as Exhibit 2 is a true and correct copy of a March 16, 2017, article by FG Alpha Management for GeoInvesting, LLC titled "*Eros' Failed Bond Offering, S&P Downgrade, Could Signal a Very Real Liquidity Crisis.*"

5. Attached hereto as Exhibit 3 is a true and correct copy of a March 29, 2017, article by FG Alpha Management for GeoInvesting, LLC titled "*Eros Associated Execs Admit on Hidden Camera They Will Launder Money Through Films.*"

6. Attached hereto as Exhibit 4 is a true and correct copy of a July 14, 2017, article by "The Geo Team" titled "*Eros: Critical Warning Signs Ahead of Upcoming Annual Report?*"

7. Attached hereto as Exhibit 5 is a true and correct copy of a July 18, 2017, article by FG Alpha Management titled "*Eros: Continued Subsidiary Sales and Expensive Debt Further Our Reasons For Concern.*"

8. Attached hereto as Exhibit 6 is a true and correct copy of certain Twitter posts by "GeoTeam" (@GeoInvesting) dated March 8, 2017; March 16, 2017; and March 29, 2017.

9. Attached hereto as Exhibit 7 is a true and correct copy of certain Twitter posts by "FG Alpha Mgmt." (@dan_fgalphamgmt) dated March 8, 2017; March 16, 2017; March 22, 2017; March 27, 2017; March 29, 2017; March 30, 2017; March 31, 2017; July 14, 2017; July 18, 2017; and July 28, 2017.

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10. Attached hereto as Exhibit 8 is a true and correct copy of certain Twitter posts by “Quoth the Raven” (@QTRResearch) dated March 8, 2017; March 9, 2017; March 13, 2017; March 14, 2017; March 16, 2017; March 29, 2017; March 31, 2017; and July 28, 2017.

11. On September 29, 2017, plaintiff commenced this action by e-filing the Summons and Complaint. A copy of the Summons and Complaint is annexed hereto as Exhibit 9.

12. Attached as Exhibit 10 is a true and correct copy of a letter dated April 14, 2017, from William M. McSwain, counsel for GeoInvesting, LLC, to Michael J. Bowe, counsel for Eros. GeoInvesting, LLC never received a response to this letter.

WHEREFORE, the GeoInvesting Defendants respectfully request that the Court enter an Order dismissing the Complaint in its entirety as against the GeoInvesting Defendants, with prejudice, and granting such other relief as the Court deems just and proper.

Dated: New York, New York
November 30, 2017



Michael de Leeuw