

KASOWITZ BENSON TORRES LLP

1633 BROADWAY
NEW YORK, NEW YORK 10019
(212) 506-1700
FAX: (212) 506-1800

ATLANTA
HOUSTON
LOS ANGELES
MIAMI
NEWARK
SAN FRANCISCO
SILICON VALLEY
WASHINGTON DC

STEPHEN W. TOUNTAS
DIRECT DIAL: (212) 506-1739
DIRECT FAX: (212) 500-3550
STOUNTAS@KASOWITZ.COM

January 16, 2018

Hon. Eileen Bransten
60 Centre Street, Room 521
New York, NY 10007

Re: *Eros International Plc v. Mangrove Partners, et al.*
Index No. 653096/2017

Dear Judge Bransten:

I am counsel to Eros International Plc in the above-referenced matter.

On November 30, 2017, the Moving Defendants¹ filed three separate orders to show cause, which seek the dismissal of Plaintiff's complaint pursuant to CPLR 3211(a)(1) and (7). Given that each of these briefs contain factual overlap and raise similar legal issues, Eros requests leave to file an omnibus opposition that does not exceed 60 pages, which is less than the 80 pages of briefing that Eros would be entitled to if it responded to each brief separately. Counsel for the Moving Defendants have notified me that they consent to this request.

I am also writing to request a brief extension of the due date for Eros' opposition brief from Thursday, January 18, 2018 to Tuesday, January 23, 2018, and to modify the due date for Defendants' reply briefs from Thursday, February 1, 2018 to Wednesday, February 7, 2018. My wife recently gave birth on January 6, 2018 and, due to unforeseen complications, my time out of the office was longer than I originally anticipated. Counsel for the Moving Defendants have notified me that they consent to this proposed modification.

This is Eros' first request for an extension in this matter. Eros does not anticipate that this proposed modification would disrupt the Court's calendar, as the Moving Defendants' motions would be fully briefed a week before the parties' February 14, 2018 hearing.

¹ "Moving Defendants" include all named Defendants except Manuel P. Asensio, Asensio & Company, Inc., Mill Rock Advisors, Inc., and all remaining John Does.

We appreciate the Court's consideration of this request.

Respectfully submitted,



Stephen W. Tountas

cc:

Michael A. Asaro
Joseph L. Sorkin
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park - Bank of America Tower
New York, NY 10036

*Attorneys for Defendants Mangrove
Partners and Nathaniel H. August*

Michael B. de Leeuw
Cozen O'Connor
45 Broadway, 16th Floor
New York, NY 10006

*Attorneys for Defendants GeoInvesting,
LLC; Christopher Irons; Daniel E. David;
FG Alpha Management, LLC; FG Alpha
Advisors; and FG Alpha, L.P.*

Susan M. Davies
Patrick L. Rocco
Stone Bonner & Rocco
1700 Broadway, 41st Floor
New York, NY 10019

*Attorneys for Defendants Nathan Z.
Anderson; ClaritySpring Inc.; and
ClaritySpring Securities, LLC*

Bryan A. Wood
Stephen Ryan, Jr.
Berman Tobacco
One Liberty Square, 8th Floor
Boston, MA 02109

*Attorneys for Defendants Nathan Z.
Anderson; ClaritySpring Inc.; and
ClaritySpring Securities, LLC*

Mitchell Cantor
The Law Offices of Mitchell Cantor
355 Lexington Avenue, Suite 401
New York, NY 10017

*Attorneys for Defendants Manuel P.
Asensio; Asensio & Company, Inc.; and
Mill Rock Advisors, Inc.*