

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

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EROS INTERNATIONAL PLC,	:	
	:	
	:	
Plaintiff,	:	
	:	
	:	
-against-	:	Index No. 653096/2017
	:	Hon. Eileen Bransten
	:	
MANGROVE PARTNERS, NATHANIEL H.	:	
AUGUST, MANUEL P. ASENSIO, ASENSIO &	:	
COMPANY, INC., MILL ROCK ADVISORS, INC.,	:	Mot. Seq. No. 004
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.	:	
	:	
----- X	:	

**AFFIRMATION OF MICHAEL J. BOWE IN OPPOSITION TO
THE GEOINVESTING DEFENDANTS’ ORDER TO SHOW CAUSE**

MICHAEL J. BOWE, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms under penalty of perjury:

1. I am a member of the law firm Kasowitz Benson Torres LLP, attorneys for Plaintiff Eros International Plc (“Plaintiff” or “Eros”). I submit this affirmation in opposition to the Memorandum of Law 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., which seeks dismissal of Plaintiff’s Complaint pursuant to New York Civil Practice Law and Rules 3211(a)(1) and (7).

2. Attached hereto as **Ex. A** is a true and correct copy of the letter from Stephen Tountas to Nathan Anderson dated October 4, 2017.

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3. Attached hereto as **Ex. B** is a true and correct copy of Bloomberg L.P.'s news feed on Eros' stock for date ranges March 13, 2017 to April 3, 2017 and June 19, 2017 to July 20, 2017 (last accessed on January 21, 2018).

4. Attached hereto as **Ex. C** is a true and correct copy of a March 8, 2017 report published on GeoInvesting.com titled, "Former Eros Co-Producer Accuses Company of 'Channeling Money to Family Members.'"

Dated: January 23, 2018
New York, New York

By: /s/ Michael J. Bowe
Michael J. Bowe