

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

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GEORGE OUZOUNIAN, P/K/A MADDOX, and
JANE DOE,

Index No. 656779/2017

Plaintiffs',

- against -

DAX HERRERA P/K/A DICK MASTERSON,
FOUNDATION DIGITAL, LLC,
GREG BOSER, LOREN BAKER,
CMGRP, INC., D/B/A WEBER SHANDWICK,
JOSHUA KAUFMAN, ASTERIOS KOKKINOS,
TREVOR BIRT, PATREON, INC., and
JORDAN COPE,

Defendants.

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AFFIRMATION OF KEVIN LANDAU, ESQ.,

KEVIN A. LANDAU, affirms the following, subject to the penalties for perjury:

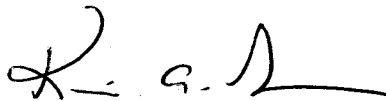
1. I am an attorney admitted to practice law in the State of New York and counsel to Plaintiff herein.
2. I have personal knowledge of the matters set forth below, and the exhibits annexed hereto are true copies of the original documents.
3. I submit this Affirmation in support of Plaintiff's Cross Motion and response in opposition of Defendants Motion to Dismiss pursuant to CPLR 3211(a)(7) and (8).
4. This action was commenced on November 6, 2017. A true copy of the Summons and Complaint is annexed hereto as **Exhibit One**.

5. Annexed hereto as **Exhibits Seven, and Eight respectively**, are true copies of social media posts, and messages, received by Plaintiff Blum, and referenced in the complaint, at ¶¶ 30-31, 33.
6. Annexed hereto as **Exhibit Nine are defamatory statements that were included in Plaintiffs** complaint at ¶ 35.
7. Annexed hereto as **Exhibit Ten** is a true copy of social media posts referenced in the complaint at ¶ 39.
8. Annexed hereto as **Exhibit 11** is a true copy of a false advertisement referenced in the complaint at ¶ 40.
9. Annexed hereto as **Exhibit 12** is a true copy of social media posts made by Defendant Kokkinos on the Dick Show fan forum on Reddit.
10. Annexed hereto as **Exhibit 13** is a true copy of a social media posts related to the “Cuckmas Carols” album, as referenced in the complaint, and memorandum hereto.
11. Annexed hereto as **Exhibit 14** is a record from Billboard Magazine.
12. Annexed hereto as **Exhibit 15** are rape threats made to Plaintiff Blum as referenced in the Complaint.
13. Annexed hereto as **Exhibit 16** is a true copy of the “Birt Statement” as referenced in the memorandum hereto.
14. Annexed hereto as **Exhibit 18** is a true copy of Defendants Discovery Responses and objections to Plaintiffs discovery requests.
15. Annexed hereto as **Exhibit 19**, are affidavits of Service for moving Defendants.

Dated: New York, New York
 February 12, 2019

Respectfully submitted,

THE LANDAU GROUP, PC



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Attorneys for Plaintiffs' Ouzounian and Blum