

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

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TGT, LLC	:	
	:	<b>Index No. 650633/2017</b>
<b>Plaintiff,</b>	:	
	:	
<b>-against-</b>	:	<b>Hon. Jeffrey Oing</b>
	:	
<b>ADVANCE ENTERTAINMENT, LLC and</b>	:	
<b>JOSEPH MELI,</b>	:	
	:	
<b>Defendants.</b>	:	
	:	
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**AFFIRMATION OF MICHAEL PAUL BOWEN IN SUPPORT  
OF DEFENDANTS' MOTION TO STAY THIS ACTION**

**MICHAEL PAUL BOWEN**, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms, under penalty of perjury, pursuant to the Civil Practice Law and Rules of the State of New York, as follows:

I am a member of Kasowitz, Benson, Torres & Friedman LLP, attorneys for Defendants Advance Entertainment, LLC and Joseph Meli. I submit this affirmation in connection with Defendants' Motion to Stay This Action.

1. Attached hereto as Exhibit A is a true and accurate copy of the indictment filed on February 23, 2017 in the matter of *U.S. v. Meli*, 1:17-cr-00127-KMW-2 (S.D.N.Y.) (ECF No. 16).

2. Attached hereto as Exhibit B is a true and accurate copy of the arraignment entry filed on February 28, 2017 in the matter of *U.S. v. Meli*, 1:17-cr-00127-KMW-2 (S.D.N.Y.) (ECF No. 18).

3. Attached hereto as Exhibit C is a true and accurate copy of the Order to Show Cause, TRO and Asset Freeze, entered on January 30, 2017 in the matter of *Securities and Exchange Commission v. Meli*, 1:17-cr-632-LLS (S.D.N.Y.) (ECF No. 19).

4. Attached hereto as Exhibit D is a true and accurate copy of the complaint filed on February 3, 2017 in the matter of *TGT, Inc. v. Meli*, 650633/2017 (N.Y. Sup. Ct.) (ECF No. 2).

5. Counsel for TGT, Inc. (“TGT”) stated on a conference call with me that, after TGT learned of the criminal case, TGT discussed its claims against Joseph Meli with the U.S. Attorney’s Office.

Dated: New York, New York  
March 20, 2017

KASOWITZ, BENSON, TORRES &  
FRIEDMAN LLP

By: /s/ Michael P. Bowen  
Michael P. Bowen  
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*Attorneys for Advance Entertainment, LLC  
and Joseph Meli*