

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

CANAL PRODUCTIONS, INC.,

PLAINTIFF,

-- against --

GRAHAM CHASE ROBINSON

DEFENDANT.

Index No. 654711/2019

AFFIDAVIT OF GRAHAM CHASE ROBINSON

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Graham Chase Robinson, being duly sworn, deposes and says:

1. I am the defendant in this action and submit this affidavit in support of my motion to stay, dismiss, and/or strike.
2. Attached hereto as **Exhibit A** is an email dated July 31, 2019 that was sent by my prior counsel, Jeffrey Pagano, Esq., to Laurent Drogin, Esq., counsel for Robert De Niro and Canal Productions, Inc.
3. Attached hereto as **Exhibit B** is an email dated August 1, 2019, that was sent by Jeffery Pagano, Esq. to Laurent Drogin, Esq. (with redactions to the names of non-parties).
4. Attached hereto as **Exhibit C** is an email dated August 2, 2019, that was sent by Jeffery Pagano, Esq. to Laurent Drogin, Esq.
5. Attached hereto as **Exhibit D** is an email dated August 13, 2019, that was sent by Jeffery Pagano, Esq. to Laurent Drogin, Esq. (with redactions to the names of non-parties).

6. Attached hereto as Exhibit E is a copy of the Complaint that Canal Productions, Inc., through its counsel Laurent Drogin, Esq., filed against me in this Court on Saturday, August 17, 2019, Index No. 654711/2019.

7. Prior to my resignation from Canal Productions, Inc., which occurred on April 6, 2019, I had not been notified of any of the accusations that appear in Canal's Complaint.

8. Attached hereto as Exhibit F is a copy of the complaint I filed against Canal Productions, Inc. and Robert De Niro in the Southern District of New York, Case No. 1:19-cv-09156.

Dated: New York, New York
December 13, 2019

Graham Chase Robinson
Graham Chase Robinson

Sworn to before me this
13th day of December, 2019

