

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

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JG CLUB HOLDINGS, LLC, as assignee of TDK Holdings,
LLC, Individually and derivatively
on behalf of JACARANDA CLUB, LLC,

Index No. 652246/10

Plaintiffs,

- against -

JACARANDA HOLDINGS, LLC, DAVID M. TALLA
a/k/a MICHAEL TALLA and CLUB AT 60TH ST., INC.

Defendants.

**REPLY AFFIDAVIT OF
JEFFREY WASSERMAN IN
FURTHER SUPPORT OF
MOTION FOR
APPOINTMENT OF
TEMPORARY RECEIVER
and to INTERVENE**

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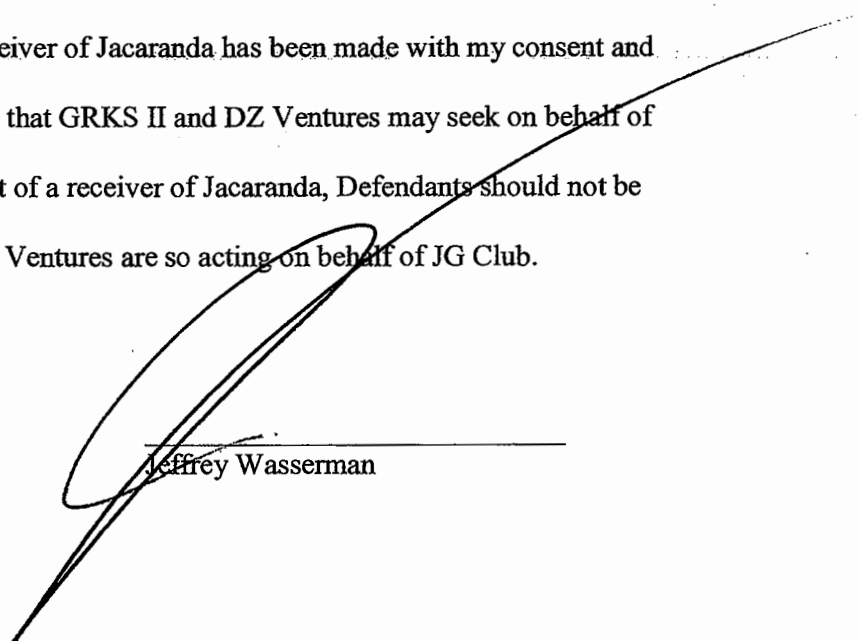
STATE OF NEW YORK)
 : ss.:
COUNTY OF New York)

JEFFREY WASSERMAN, being duly sworn, deposes and says:

1. I am the majority owner and managing member of plaintiff JG Club Holdings, LLC ("JG Club"). As such, I am fully familiar with the facts stated in this affidavit.
2. I respectfully submit this affidavit in support of the motion by GRKS II, LLC ("GRKS II") and DZ Ventures, LLC ("DZ Ventures") for the dissolution and appointment of a receiver of Plaintiff Jacaranda Club, LLC ("Jacaranda").
2. GRKS II and DZ Ventures each own a minority membership interest in plaintiff JG Club, which in turn owns a 48.9% ownership interest in Jacaranda. Jacaranda's only business is, in turn, the operation of the club, restaurant and bar known as "Sapphire New York," located at 333 East 60th Street, New York, New York (hereinafter, "Sapphire").
3. Specifically, I submit this affidavit to confirm that I discussed in detail with Jack Constantine and Francis Moezinia GRKS II's and DZ Ventures' belief that an application should be made for the dissolution and appointment of a receiver of Jacaranda. I explained to them that

I did not intend to bring such applications on behalf of JG Club, and invited GRKS II and DZ Ventures to seek such relief if they consider the same to be appropriate.

6. Accordingly, GRKS II's and DZ Ventures' application on behalf of JG Club for the dissolution and appointment of a receiver of Jacaranda has been made with my consent and approval. Since I have expressly agreed that GRKS II and DZ Ventures may seek on behalf of JG Club the dissolution and appointment of a receiver of Jacaranda, Defendants should not be heard to complain that GRKS II and DZ Ventures are so acting on behalf of JG Club.


Jeffrey Wasserman

Sworn to and subscribed before me
this 22nd Day of December, 2011

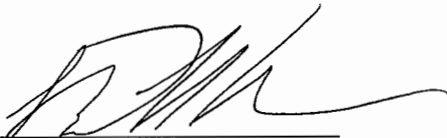

Notary Public

**SALLY WASSERMAN
NOTARY PUBLIC
STATE OF NEW YORK
NEW YORK COUNTY
02WA6137089
COMM. EXP. 11 / 14 / 2013**

CERTIFICATION OF ATTORNEY

I hereby certify that to the best of my knowledge, information and belief, formed after an inquiry that I consider to have been reasonable under the circumstances, that no contention in this submission is frivolous as defined in subsection (c) of section 130-1.1 of the Rules of the Chief Administrator.

Dated: Melville, New York
December 21, 2011



Lloyd M. Eisenberg