



A-350









A-354



A-355



EXHIBIT 107
Department NERA
12/13/09
www.nera.gov

A-356

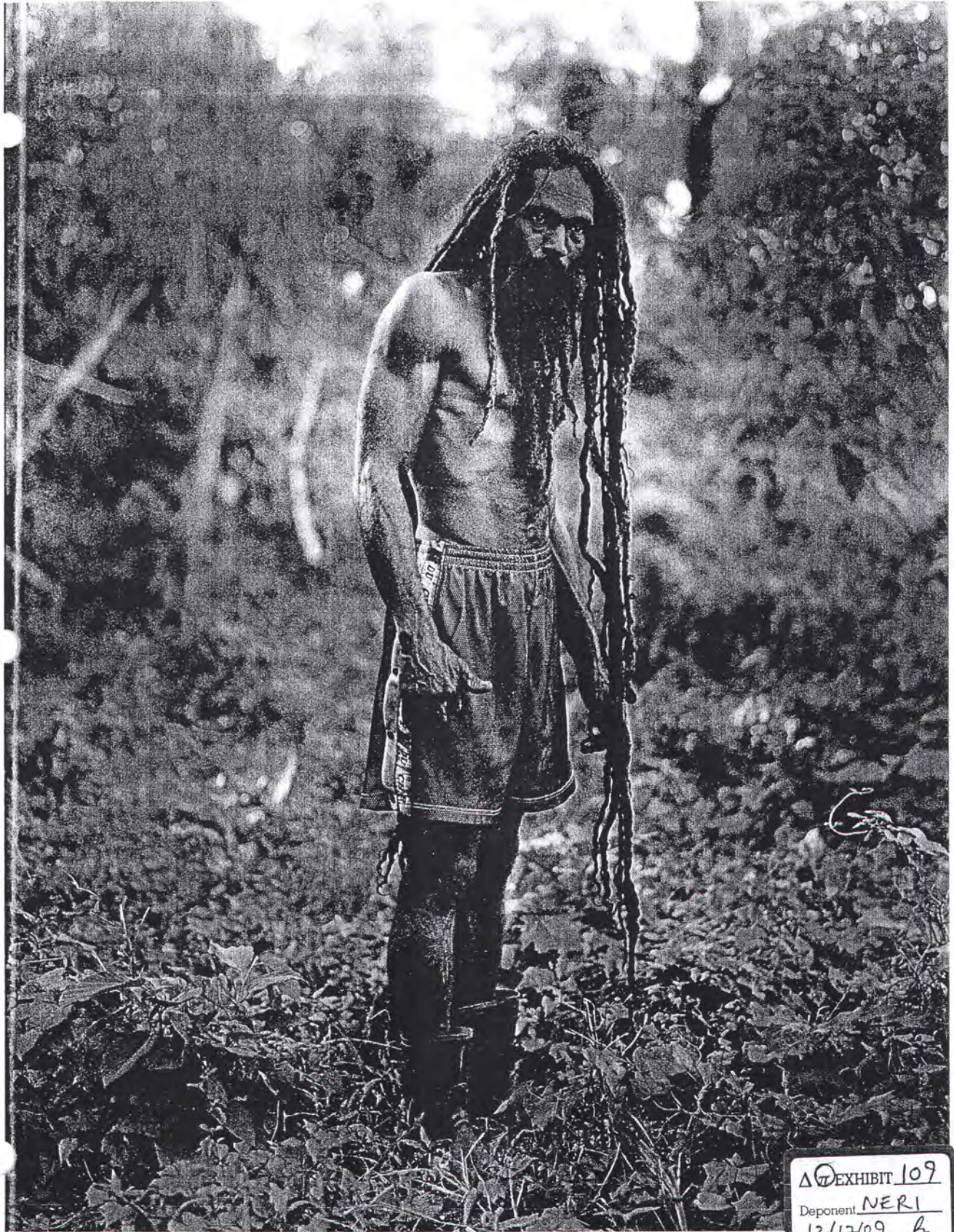
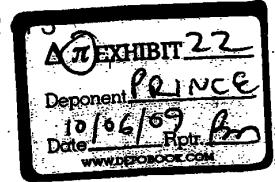


EXHIBIT 109
Deponent NERI
Date 12/17/09 Rptr. fm
WWW.DEPOBOOK.COM



The Pitch

Charles Company, his wife, son and daughter arrive at the St. Barts airport, late afternoon two days before Xmas, he's meeting up with his brother and sister-in-law... staying on the island for a couple of weeks... vacation... As he's landing, he sees out the window a lot of people running around... general commotion.

As the plane taxis up to the gate he asks the pilot what's going on...

As the Company family disembarks the plane, there's more pandemonium...

People grabbing, shouting, some hysterical... it's a tiny airport, but there's an overload of people waiting to get thru customs and many people literally "crying"... they're "crying" because there are no planes going out... no planes returning to St. Martins... returning to Miami... returning to

NYC... returning to London... returning anywhere...

There are no returning flights because these cities and many other major "areas" in the continental U.S. and Western and Eastern Europe have just been obliterated by nuclear attack.

Charles Company and his family are informed of this fact and seemed to melt into the tarmac under 88 degree temps... holding their bags, their backpacks... what will come to be as all their worldly possessions.

They hook up with Charles's brother, who will fill them in with a bit more detail of the events "round" the world. "What are we suppose to do?" is Charles's wife's first question...

"There's nowhere to go", is the first answer.

A good part of the world, "most" of the world, has been nuked and they are here on a tiny French island in the middle of nowhere... which in a year's time will become part *On the Beach*, part *Lord of the Flies*.

Background: Charles is 55, has no military background, is pretty much out of shape... makes his living as an architect.

To make this pitch even shorter I'm going to cut to a year later...

People on the island have broken up into "tribes"... most of the houses have been ransacked and all of the hotels occupied.

Charles Company is now Charlie Company. He has been exercising. Hes also learned to load a weapon, field dress a wound, cook without a fire. His daughter is the #1 scavenger...

He, his wife, son and daughter, brother and sister-in-law, (along with several followers) have taken over the Eden Rock Hotel. It's headquarters.

Stockpiled. A Mini-Mart. As best a fortress as can be under the circumstances. Everything is rationed, everything is "used"...

Next:

Charles's son is standing lookout. Thru his telescope out in the ocean he sees what appears to be a periscope...he sounds the alarm...

The movie is called Eden Rock...

Tuesday, October 21, 2008 2:07 PM

Subject: RE: "The Pitch"
 Date: Tuesday, October 7, 2008 4:41 PM
 From: Louise Neri <louise@gagosian.com>
 To: Betsy Biscone <biscone@prince-studio.com>

Dear Betsy—


Thanks so much for all this.

I definitely want to talk to Richard, but let me get started. Would be great if we can schedule something in on Thursday, then I can get done by the end of the week.

regards and see you soon!

Louise

Louise Neri
 Gagosian Gallery
 555 West 24th Street,
 New York NY 10011
 louise@gagosian.com
 general: + 1 212 741 1111
 direct: + 1 646 421 2079

 Think before you print.

From: betsy biscone [mailto:biscone@prince-studio.com]
 Sent: Tuesday, October 07, 2008 4:29 PM
 To: Betsy Biscone; Louise Neri
 Cc: Melissa Lazarov
 Subject: Re: "The Pitch"

Dear Louise,
 I hope this finds you well. Per Richard's request, please find attached *The Pitch*, which was displayed on the wall at the Eden Rock Hotel in Saint Barth for last December 2007, *Eden Rock Show*. Also, you'll find below additional writing Richard did this past Spring '08.

I understand you would like to talk with him at some point. Tell me know what you are thinking so I can schedule something in.
 Do let me know if there is any question or if I can be of further assistance.
 All best,

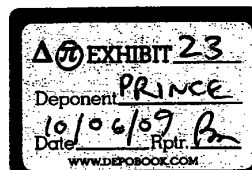
Betsy Biscone
 --
 Prince Studio Manager
 R'ville, NY 12147
 T: 518.797.5279
 F: 518.797.9875

-- Additional Eden Rock/Pitch Material written MARCH 2008 --

More on Eden Rock

1. Rastas and Reggae... they escape from one of the Cruise ships, (they were the band aboard the ship) three days after the bombs went off. They go to the Hotel Manapany. Six band members, two roadies and a manager.
2. The Backpackers... these are college kids, use to spring breaks, know nothing of responsibility or the real world.

Page 1 of 2



CONFIDENTIAL - PR00075

They gather first in bars then take over a small hotel just above Shell Beach. They keep partying, drinking, smoking... they are the first to "go native"... the first to smear "war paint" on their bodies... they're also the first to get wiped out....

3. The Amazons... Four Lesbians who escape a second Cruise ship, who bring along part of the crew and take over the Guanahani Hotel. These are large well built women along the lines of Shena Queen of the Jungle, Wonder Woman, Cat Woman, think Raquel Welch meets Linda Hamilton in the Terminator. Their outfits, hair and make-up remind us of Road Warriors....

4. The Ultimate Ones... this tribe is made up of rich, affluent, masters of the universe... these are guys who own the huge private boats parked in Gustavia... they have the loyalty of their crews, they have their own weapons and in the beginning access to food and water. They quickly make deals with the local St. Bart police force. They stay on their boats at first but then take over the Ill de France hotel... these guys are use to privilege and shaping the future... they don't take "no" for an answer... they believe they "own" the Island and everyone is their subject... several come to be assassinated, held hostage, and hanged upside-down... in an opening scene one of them is pictured buried up to his head in the sand at Saline Beach with the tide coming in...

These are the four main tribes along with Charlie Company...

Charlie Company represents "family"

Rastas and Reggae represents "the disenfranchised"

Backpackers represent "alternative"

Amazons represent "sex"

Ultimate Ones represent "power"

Richard Prince

----- End of Forwarded Message

MENU CURRENT

GAGOSIAN GALLERY

RICHARD PRINCE

CANAL ZONE
NOVEMBER 8 - DECEMBER 20,
2008

555 West 24th Street
New York, NY 10011
Tel 212.741.1111 Fax 212.741.9611
Tue-Sat 10-6
Gallery Information
Gallery Map

- PRESS RELEASE
- VIEW WORK
- VIEW CATALOG
- ARTIST INFO



MORE

Updated Jul 18th 2008 4:57PM

Richard Prince



VIEW

Updated Nov 21st 2008 4:57PM

Richard Prince
Canal Zone

VIEW

Gagosian RSS Feed

"The story was basically about a guy who lands in St Barth, gets off the plane, is immediately told that there's been a nuclear holocaust in the rest of the world, and he looks at his family and says 'We can't go back.'"
--Richard Prince

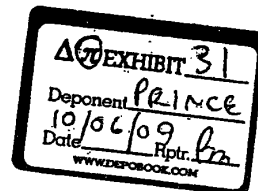
Gagosian Gallery is pleased to announce "Canal Zone," an exhibition of new paintings by Richard Prince.

Following his burlesque dialogues with the art of De Kooning, Picasso, and *Naughty Nurse* pulp fiction, Prince has turned to his own biographical roots for inspiration. The Panama Canal Zone, where he was born, was, until 1979, a political exclave of the U.S., part-colonial company enclave and part-socialist government, purportedly dominated by virulent separatist racism. In his characteristic manner, Prince has transformed the former reality of his birthplace into a fictive space: "Canal Zone" provides an anarchic tropical scenario in which extreme emanations of the (white American male) *id* - fleshy female pin-ups, Rastafarians with massive dreadlocks, electric guitars, and virile black bodies - run riot.

Aside from their "storyboard" looks and their ability to absorb information based on Prince's original "pitch," what is evidently new in these paintings is the way they are, literally, "put together," like provisional magazine lay-outs.

http://www.gagosian.com/exhibitions/2008-11-08_richard-prince/

12/8/2008



C00008

Some images, scanned from originals, are printed directly onto the base canvas; others are "dragged on," using a primitive collage technique whereby printed figures are roughly cut out, then the backs of those figures painted and pasted directly onto the base canvas with a squeegee so that the excess paint squirts out on and around the image. On top of this are violently suggestive swipes and drips of vivid paint and scribbles of oil-stick crayon which, together with the comic, abstract sign-features that mask each figure's face, add to the powerful push-pull between degree and effect. This has become a completely new way for Prince to make a painting, where much of what shows up on the surface is incidental to the process.

Thomas More's *Utopia* of 1518 described a fictional island in the Atlantic Ocean that possessed a seemingly perfect socio-political-legal system. Since then, the term has been used both for intentional communities attempting to create ideal societies and ideals that are impossible to achieve. Prince's island and its unfettered imaginings that vacillate between humorous delinquency and Sadeian excess, is a rather more carnivalesque response to the original concept. "Canal Zone," this orgiastic, post-nuclear, new order for civilization as we once knew it, takes its place among other great modern visions of the apocalypse, from Joseph Conrad's *Heart of Darkness* and Pablo Picasso's *Guernica*, to The Beatles' "Helter Skelter" and Michel Houellebecq's prophetic *Platform*.

Richard Prince was born in 1949 in the Panama Canal Zone and lives and works in upstate New York. His work has been the subject of major exhibitions, including the Whitney Museum of American Art, New York; the San Francisco Museum of Modern Art; Museum Boijmans van Beuningen, Rotterdam; Museum für Gegenwartskunst, Basel; Kunstmuseum Wolfsburg; Serpentine Gallery, London (2008). A retrospective survey opened at the Solomon R. Guggenheim Museum in 2007 and traveled to The Walker Art Center, Minneapolis in 2008.

For more information, please contact Melissa Passman at 212.741.1111 or mpassman@gagosian.com.

MENU ARTISTE

GAGOSIAN GALLERY

RICHARD PRINCE

ARTIST BIOGRAPHY
ARTIST EXHIBITIONS
PUBLICATIONS



Untitled (Girlsie), 1992
Etching on paper
8 x 5-3/8 inches (20.3 x 13.7 cm)
Edition

Richard Prince was born in 1949 in the Panama Canal Zone and lives and works in upstate New York. Mining images from mass media, advertising and entertainment since the late seventies, Prince has redefined the concepts of authorship, ownership, and aura. Applying his understanding of the complex transactions of representation to the making of art, he evolved a unique signature filled with echoes of other signatures yet that is unquestionably his own. An avid collector and perceptive chronicler of American subcultures and vernaculars and their role in the construction of American identity, he has probed the depths of racism, sexism, and psychosis in mainstream humor; the mythical status of cowboys, bikers, customized cars, and celebrities; and most recently, the push-pull allure of pulp fiction and soft porn, producing such unlikely icons as the highly coveted Nurse paintings.

MORE

Updated Nov 26th 2008 6:05PM

Richard Prince



Canal Zone

Nov 6 - Dec 20, 2008
24th Street

VIEW

Updated Nov 21st 2008 4:39PM

Richard Prince

Canal Zone

VIEW

Gagosian RSS Feed

Art + Auction November 2008

November 8 -
December 20, 2008

Gagosian Gallery
555 West 24th St
New York 10011
T 212.741.1111

www.gagosian.com



RICHARD PRINCE

! CONFIDENTIAL

GG0076

November 8 –
December 20, 2008

Gagosian Gallery
555 West 24th St
New York 10011
T 212.741.1111

www.gagosian.com

Art in America November 2008



RICHARD PRINCE

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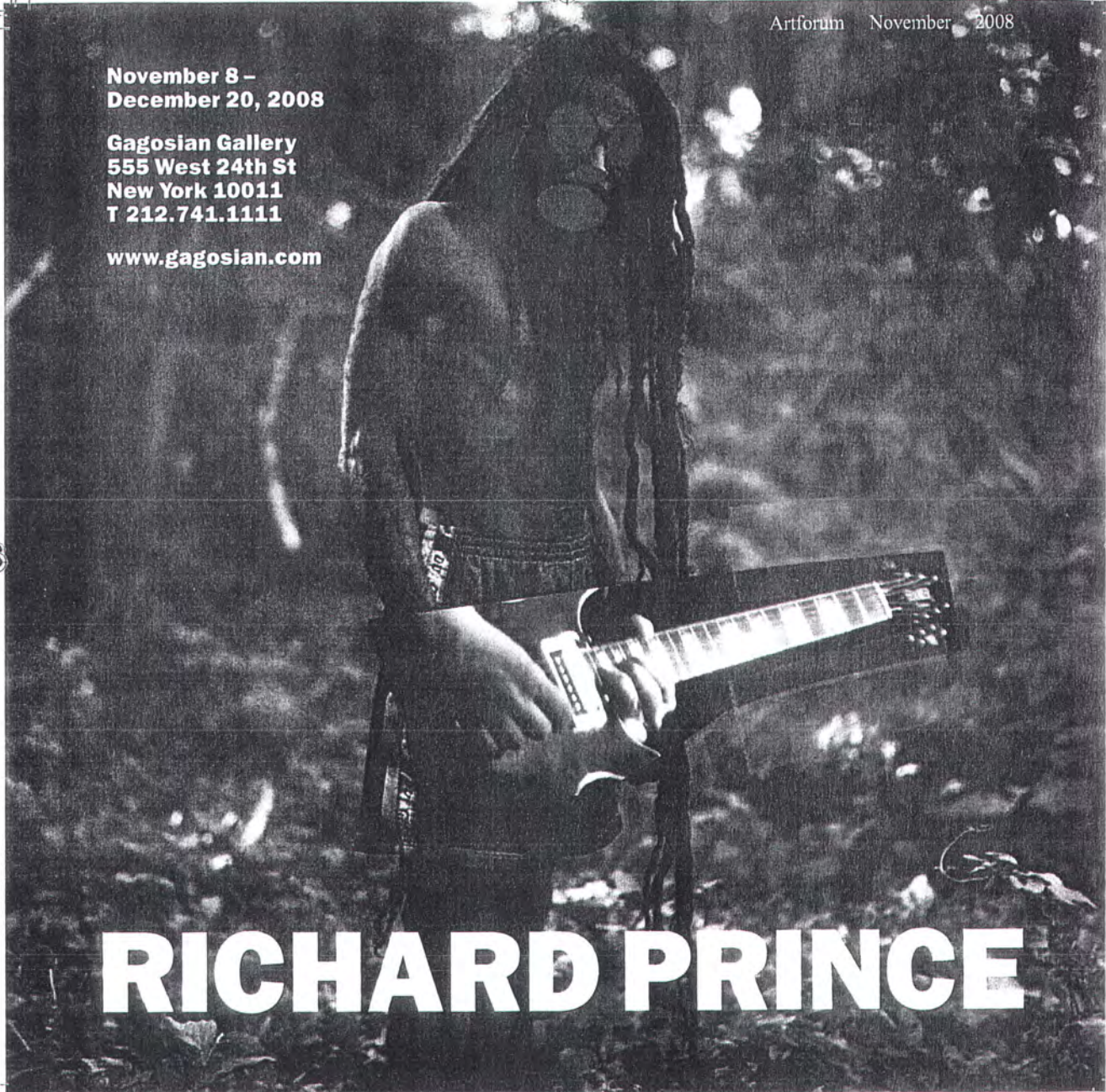
GG0077

Artforum November 2008

November 8 –
December 20, 2008

Gagosian Gallery
555 West 24th St
New York 10011
T 212.741.1111

www.gagosian.com



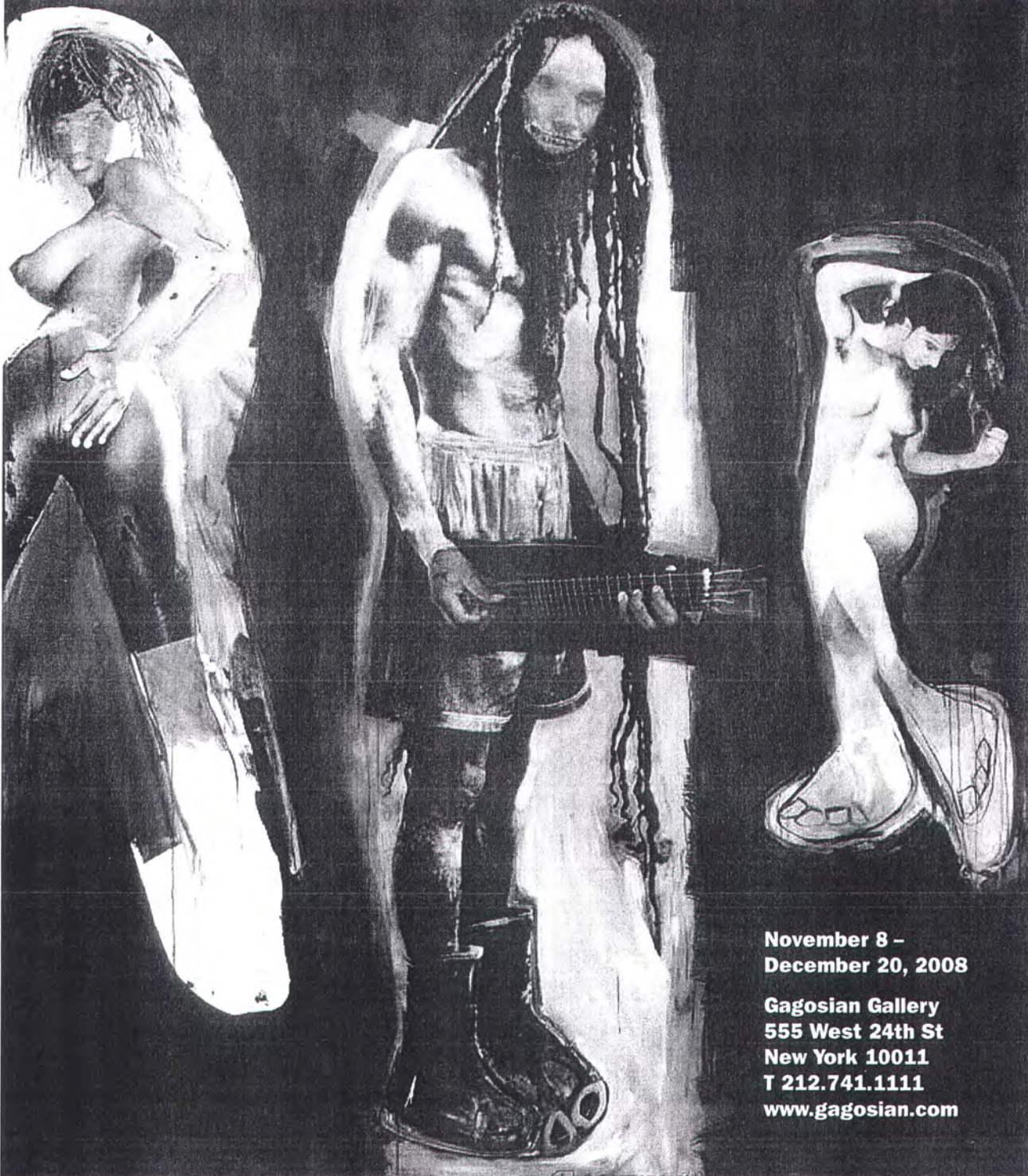
RICHARD PRINCE

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GG0078

W magazine November 2008

RICHARD PRINCE



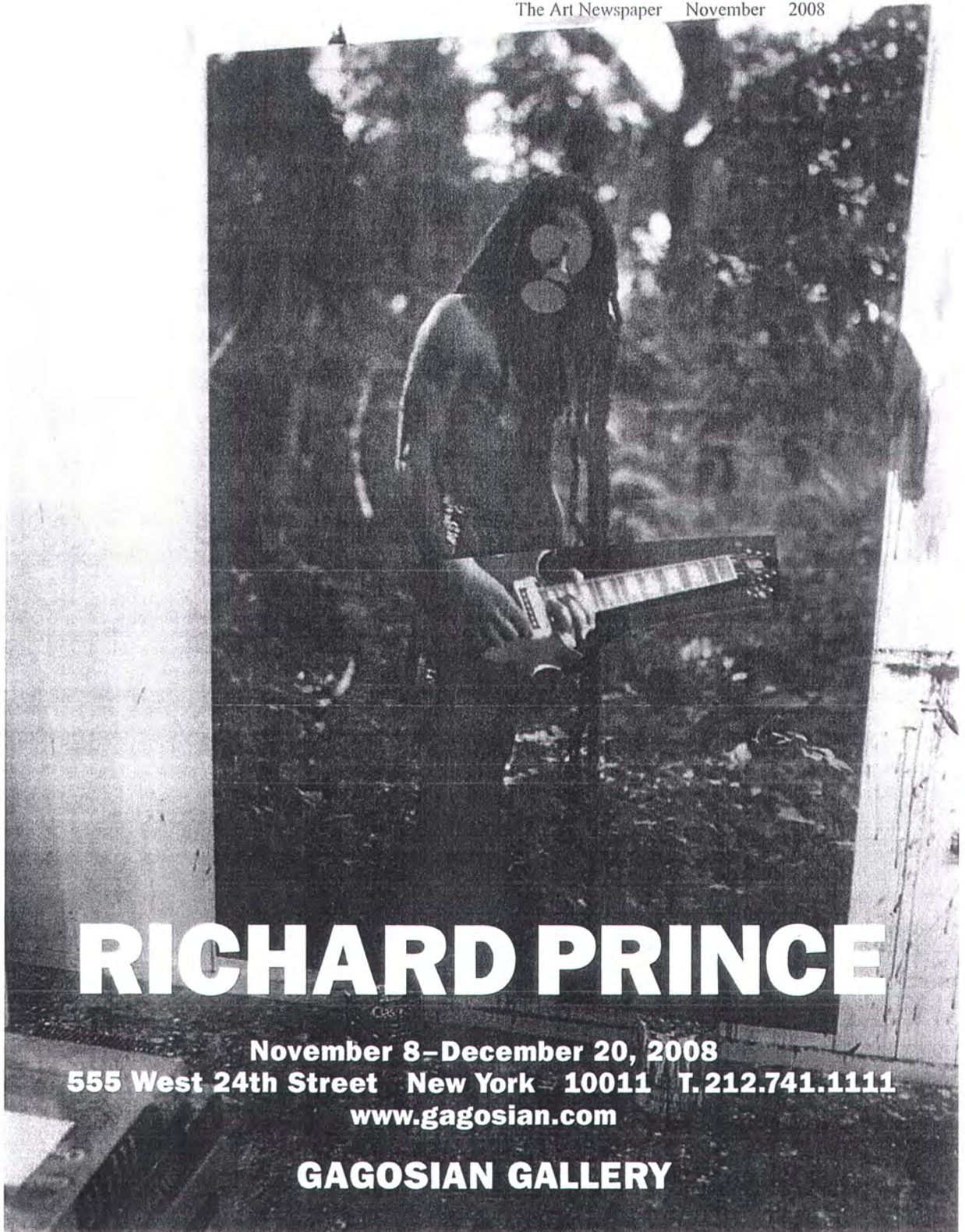
November 8 -
December 20, 2008

Gagosian Gallery
555 West 24th St
New York 10011
T 212.741.1111
www.gagosian.com

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GG0079

The Art Newspaper November 2008



RICHARD PRINCE

November 8–December 20, 2008

555 West 24th Street New York 10011 T.212.741.1111

www.gagosian.com

GAGOSIAN GALLERY

From: Alison McDonald
Sent: Thursday, October 2, 2008 5:22 PM
To: Darlina Goldak <dgoldak@gagosian.com>
Subject: FW: images for Interview

From: Melissa Lazarov
Sent: Thursday, October 02, 2008 4:56 PM
To: Alison McDonald; Nicole Heck
Subject: FW: images for Interview

see below - I need to send some jpegs to glenn. please attach for me. Melissa

From: betsy biscone [mailto:bbiscone@prince-studio.com]
Sent: Thursday, October 02, 2008 4:52 PM
To: Melissa Lazarov
Cc: Glenn O'Brien
Subject: Re: images for Interview

Dear Melissa,

Per Glenn's O'Brien's request below, would you kindly have your team send him a small selection of high Res Rasta works. Please include James Brown Disco Ball, Meditation & a few others to chose from.

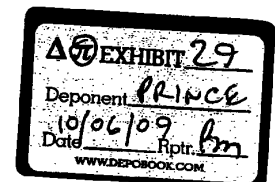
Many thanks in advance.

bets

On 10/2/08 4:14 PM, "Glenn O'Brien" <gobrien@brantpub.com> wrote:

Hi Betsy,

Richard said you could hook us up with images for his interview. I love the rasta work and would like to run several big pages. We are on a tight deadline. What's the next step?
Glenn



From: Darlina Goldak
Sent: Thursday, September 25, 2008 11:46 AM
To: Nicole Heck <nheck@gagosian.com>
Subject: Richard Prince painting layouts - notes from mlaz

Mlaz/LG notes on Prince:

-They would like the blue Rasta man (image attached) on the cover. They like the textured, burlap surface that is on the back of the dummies. Please try the blue Rasta man on this surface for the cover. She seemed indifferent about if the textured surface is also on the back when I asked.

-They would like the book larger, both horizontally and vertically. If the book needs to be more vertical because the blue Rasta image is vertical, that is fine. I asked her if she had a book in mind to compare for size, but she could not come up with an example.

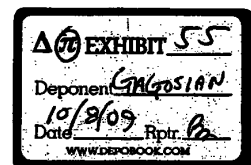
-They like the binding with the spine sandwiched by the front and back cover.

-Please include "Essay" or "Text by James Frey" in the title page. They want the book to come up if you Google James Frey.

-Please include source material in the book. They want you to "get into his head" and see how he got to where he is and see where he is going. (I'm looking into this)

-They want a more interesting, non-traditional way to present the text in the book. Alison explained this to Ivor yesterday.

Note, Richard Prince will be sending us more studio photos soon.



A-371

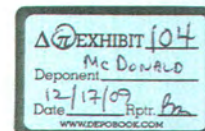


GGP00139A

RICHARD PRINCE

November 8–December 20, 2008
Opening reception Saturday, November 8, 6–8pm

Gagosian Gallery
555 West 24th St, New York 10011
T 212.741.1111
www.gagosian.com



From: Andie Trainer <atrainr@gagosian.com>
Sent: Friday, December 5, 2008 2:16 PM
To: Jessica Arisohn <jarisohn@gagosian.com>
Subject: Ryan from Rare Posters

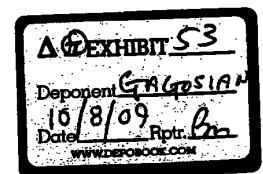
Hi Jessy,

Ryan from Rare Posters came by today and picked up two boxes, or 100, Richard Prince invites. You can now deduct the \$100 from his account.

Best,

Andie

Andie Trainer
Gagosian Gallery
555 W. 24th Street
New York, NY 10011
212.741.1111
atrainr@gagosian.com



From: Jessica Arisohn
Sent: Wednesday, November 19, 2008 3:00 PM
To: Alison McDonald <amcdonald@gagosian.com>; Nicole Heck <nheck@gagosian.com>;
Darlina Goldak <dgoldak@gagosian.com>
Subject: FW: Ryan from Rare Posters

Ryan Dowler wants Prince Canal Zone – Andie says we have three extra boxes left. Don't know if we should give it to him though as he has acted a bit shady in the past but otherwise they will be tossed. What do you think?

From: Andie Trainer
Sent: Wednesday, November 19, 2008 10:16 AM
To: Jessica Arisohn
Subject: Ryan from Rare Posters

Hi Jessy,

Ryan from Rare Posters emailed me expressing interest in scooping up any extra Prince invites we might have. We did get quite a few (we started with seven boxes, three remain)... but somehow it doesn't seem right for him to be **SELLING** our invitations. Thought I'd run it by you for a second opinion before I got back to him. Let me know your thoughts.

Thanks,

Andie

Andie Trainer
Gagosian Gallery
555 W. 24th Street
New York, NY 10011
212.741.1111
atrainier@gagosian.com

From: Nicole Heck
Sent: Wednesday, November 19, 2008 3:08 PM
To: Alison McDonald <amcdonald@gagosian.com>
Cc: Jessica Arisohn <jarisohn@gagosian.com>; Darlina Goldak <dgoldak@gagosian.com>
Subject: RE: Ryan from Rare Posters

Shouldn't we get a percentage of the sale if he is selling something we paid to produce?

From: Jessica Arisohn
Sent: Wednesday, November 19, 2008 3:00 PM
To: Alison McDonald; Nicole Heck; Darlina Goldak
Subject: FW: Ryan from Rare Posters

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Thanks,

Andie

Andie Trainer
Gagosian Gallery
555 W. 24th Street
New York, NY 10011
212.741.1111
atrain@gagosian.com

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Sent: Wednesday, November 19, 2008 3:16 PM
To: Nicole Heck <nheck@gagosian.com>
Cc: Jessica Arisohn <jarisohn@gagosian.com>; Darlina Goldak <dgoldak@gagosian.com>
Subject: RE: Ryan from Rare Posters

We should sell them to him.

From: Nicole Heck
Sent: Wednesday, November 19, 2008 3:08 PM
To: Alison McDonald
Cc: Jessica Arisohn; Darlina Goldak
Subject: RE: Ryan from Rare Posters

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Thanks,

Andie

Andie Trainer
Gagosian Gallery
555 W. 24th Street
New York, NY 10011
212.741.1111
atrainr@gagosian.com

LARRY GAGOSIAN

IS PLEASED TO INVITE

.....
TO A DINNER GIVEN ON SATURDAY, 8 NOVEMBER 2008, AT 8:30 PM

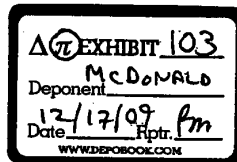
IN HONOR OF

RICHARD PRINCE

PRIVATE ROOF CLUB
GRAMERCY PARK HOTEL
2 LEXINGTON AVENUE, NY

RSVP KAREN HO
KAREN@GAGOSIAN.COM
212.741.1111

GGP001696A





From: Tom Duncan <tduncan@gagosian.com>
Sent: Saturday, September 6, 2008 10:03 AM
To: Anita Foden <anita@gagosian.com>
Subject: RE: Prince works received today

Anita,

RPS510 and RPS511 DO NOT match what we have received. *Cookie Crumbles* is the work with seven figures, *Untitled (Rastas)* (though on the back it is *Untitled (Rasta)*) is the work with four figures. All else matches – however, the list they provided does not have the *Specially Round Midnight* diptych on it, even though it is indeed here at 555.

All works were photographed yesterday EXCEPT the ~~Redacted~~

Redacted

Thanks!

THOMAS DUNCAN
 GAGOSIAN GALLERY
 555 WEST 24TH STREET
 NEW YORK NY 10011
 TEL: 212.741.1111
 FAX: 212.741.9616

From: Anita Foden
Sent: Friday, September 05, 2008 3:24 PM
To: Tom Duncan
Subject: FW: Prince works received today

Anita Foden
 Gagosian Gallery
 980 Madison Avenue
 New York, NY 10021
 Tel 212 744 2313
 Fax 212 772 8696
 anita@gagosian.com

From: ebrown [mailto:ebrown@prince-studio.com]
Sent: Friday, September 05, 2008 3:19 PM
To: Anita Foden
Subject: Re: Prince works received today

Anita,

Attached is a list of the works you received from the LI Studio. Can you please double check that RPS510 and 511 match what you have received – please check the title on back of painting - Richard couldn't remember which was which.

From: Anita Foden
Sent: Friday, September 05, 2008 3:24 PM
To: Tom Duncan
Subject: FW: Prince works received today

Anita Foden
Gagosian Gallery
980 Madison Avenue
New York, NY 10021
Tel 212 744 2313
Fax 212 772 8696
anita@gagosian.com

From: ebrown [mailto:ebrown@prince-studio.com]
Sent: Friday, September 05, 2008 3:19 PM
To: Anita Foden
Subject: Re: Prince works received today

Anita,
Attached is a list of the works you received from the LI Studio. Can you please double check that RPS510 and 511 match what you have received ☐ please check the title on back of painting - Richard couldn't remember which was which. Thanks for all and let me know if you need anything else.

All best,
Eric

Eric Brown
--
Prince Studio
T: 518. 797. 5279
C: 347. 423. 7530
F: 518. 797. 9875

On 9/5/08 2:13 PM, "Anita Foden" <anita@gagosian.com> wrote:

Hi Eric,

Hope you are well and enjoying this last bit of summer.

We received the 15 Prince works today ☐ can you please forward me a list so we can match the RPS numbers for our records?

Best regards,
Anita Foden

Anita Foden
Gagosian Gallery
980 Madison Avenue
New York, NY 10021

From: Karen Ho <karen@gagosian.com>
Sent: Tuesday, October 28, 2008 12:51 PM
To: Vanessa Riding <vriding@gagosian.com>; Rysia Murphy <rysia@gagosian.com>
Subject: FW:

One more for Victoria's list.

-----Original Message-----

From: Victoria Gelfand
Sent: Tuesday, October 28, 2008 12:50 PM
To: Karen Ho
Subject: Re:

I need to add **Redacted** to list

----- Original Message -----

From: Karen Ho
To: Victoria Gelfand
Sent: Tue Oct 28 16:45:03 2008
Subject: RE:

Hi Victoria,

As per LG, he needs to approve everyone we are inviting to the Prince dinner. I have sent it on to Vanessa and Rysia and they will let me know as soon as he gives the okay.

Sorry for the delay. I will email you as soon as I know.

-----Original Message-----

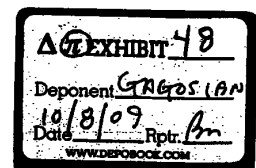
From: Victoria Gelfand
Sent: Tuesday, October 28, 2008 12:40 PM
To: Karen Ho
Subject:

Dear Karen

Pls email me prince dinner invite. Have you invited all the people val sent you from my side?

How are we doing with numbers? Could I add a couple more? Will it be separate tables?

Thanks



From: Karen Ho <karen@gagosian.com>
Sent: Tuesday, October 28, 2008 2:24 PM
To: Vanessa Riding <vriding@gagosian.com>; Rysia Murphy
<rysia@gagosian.com>
Subject: Prince invites

Candy would like to invite Redacted and Redacted Both are LA-based so she thinks it is unlikely that they will come. Please have LG approve.

From: Vanessa Riding
Sent: Thursday, October 30, 2008 10:19 AM
To: Rysia Murphy <rysia@gagosian.com>; Karen Ho <karen@gagosian.com>
Subject: RE: VG Richard Prince invitees

-----Original Message-----
From: Rysia Murphy
Sent: Tuesday, October 28, 2008 10:51 AM
To: Vanessa Riding
Subject: FW: VG Richard Prince invitees

-----Original Message-----
From: Rysia Murphy
Sent: Tuesday, October 28, 2008 10:50 AM
To: Vanessa Riding
Subject: VG Richard Prince invitees

This list is fine. I took off the names that LG said no to.

Redacted

From: Karen Ho <karen@gagosian.com>
Sent: Tuesday, November 4, 2008 3:50 PM
To: Rysia Murphy <rysia@gagosian.com>; Vanessa Riding <vriding@gagosian.com>
Subject: FW: For LG to check for Prince opening and dinner

These people were on the **Redacted** committee for Prince. I have deleted names of people we have already invited. Please ask LG if he would like any of these people invited.

From: Louise Neri
Sent: Tuesday, November 04, 2008 3:46 PM
To: Karen Ho
Subject: For LG to check for Prince opening and dinner

Hi Karen—

Obviously many of these people are already on our invitation list. I have deleted **Redact** and **Redact** from the Guggenheim's original list.

Richard Prince: **Redacted**

Redacted

From: Rysia Murphy
Sent: Wednesday, November 5, 2008 10:22 AM
To: Olivia Byron <olivia@gagosian.com>
Subject: Prince Dinner Invite
Attach: RP.pdf

<<...>> Olivia,

Attached is the invite. Please just make sure it is not sent to anyone that has not been approved by LG as he his being very strict about this dinner.

Let me know if you need anything else!

Rysia

From: Rysia Murphy
Sent: Saturday, November 8, 2008 12:25 PM
To: Victoria Gelfand <victoria@gagosian.com>
Subject: FW: Prince dinner list
Attach: Prince dinner.doc

Victoria,

Attached is the most up to date dinner list. As you know LG has been super intense about whose invited etc. so please don't show the list to anyone etc. And of course, if you have any additions they have to be cleared by LG. Let Karen or me know if you have any questions!

Also, there are some new changes that haven't been added to the attached list but it's pretty close to correct.

Thanks,

Rysia

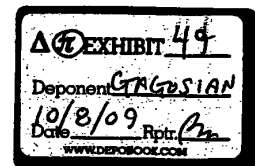
From: Meredith Dunn <mdunn@gagosian.com>
Sent: Thursday, October 23, 2008 10:29 AM
To: Sam Orlofsky <sam@gagosian.com>; Rebecca Sternthal <rebecca@gagosian.com>; Stefan Ratibor <sratibor@gagosian.com>; Valentina Castellani <vcastellani@gagosian.com>; Victoria Gelfand <victoria@gagosian.com>; John Richardson <jrichardson@gagosian.com>; Deborah McLeod <dmcleod@gagosian.com>; Candy Coleman <candy@gagosian.com>; Lauren McCaffrey <lauren@gagosian.com>; Domenica Stagno <domenica@gagosian.com>; Andrea Crane <andrea@gagosian.com>; Karen Ho <karen@gagosian.com>; Melissa Lazarov <mlaz@gagosian.com>; Ealan Wingate <ewingate@gagosian.com>
Cc: Vanessa Riding <vriding@gagosian.com>; Rysia Murphy <rysia@gagosian.com>
Subject: Prince in Chelsea

Larry would like the opening and dinner to be "kick ass" so please invite celebrities/moma/gugg/whitney curators and other clients who will BUY his work. However, do not invite someone unless you confirm this with Vanessa, Ryscha, or Karen.

Vanessa has the list of people from Larry so far so feel free to touch base with her.

Many thanks,
Meredith

DETAILS-
Opening is on Saturday November 8th at 24th St.
Dinner to follow at
Gramercy Park Hotel
Sent via BlackBerry by AT&T



From: Vanessa Riding
Sent: Thursday, October 23, 2008 2:29 PM
To: Barbara Wilhelm Dwek <barbara@gagosian.com>
Cc: Karen Ho <karen@gagosian.com>
Subject: RE: prince dinner

Before Larry approves this list he would like to know if you have sold any art to these people. If so, he would like to see proof.

From: Melissa Lazarov
Sent: Thursday, October 23, 2008 1:53 PM
To: Karen Ho
Cc: Vanessa Riding; Rysia Murphy
Subject: RE: prince dinner

will you run these names by lg for approval

From: Karen Ho
Sent: Thursday, October 23, 2008 1:51 PM
To: Melissa Lazarov
Subject: FW: prince dinner

These are the people Barbara wants to invite to the dinner after receiving LG's email. Yes or no?

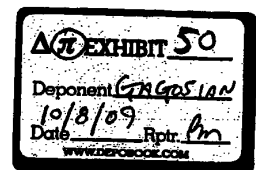
From: Barbara Wilhelm Dwek
Sent: Thursday, October 23, 2008 1:50 PM
To: Karen Ho
Subject: prince dinner

Redacted

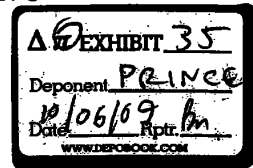
BARBARA WILHELM DWEK

Gagosian Gallery
555 West 24 Street
New York, New York, 10011

tel +1 212 741 1111
fax +1 212 741 9616
cell +1 917 257 9133



Richard Prince
November 8, 2008
Gramercy Park Hotel



TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	Abramovich and Dasha Zhukova	Roman	LG	
	Ames	Ann and Steven	LN	
	Anderson	Pamela	RP	
	Andich	Lidia	LG	
	Arabov	Jacob and Angela	VG	2
Mr.	Armstrong	Richard	LG	
	Arnault	Bernard	RP	
Mr.	Arslanian and Cecile	Ara	LG	2
	Ash and Peter Ezersky	Lorinda	ML	2
	Atencio Demirdjian	Tiqui	VG	1
	Aven	Peter	VG	
	Avini	Andy	GG	1
	Baibakov	Maria	VG	1
	Baron	Fabien	RP	
	Basilico	Stefano	LG/SO	
	Bauer and Jemilah Afshar	Sasha	ML	2
	Baybakov and Lena	Oleg	LG	2
	Belchanskaya	Marianna	VG	
	Bell	William and Maria	LG/RP	
	Berger	Karen and Martin	LN	
Mr.	Berggruen	Nicolas	LG	0
	Bernardi	David	CC	0
	Beyer	Michele		
	Biesenbach	Klaus	LN	
	Biscione and Rob Currie	Betsy	RP	2
Mr. and Mrs.	Black	Leon	LG	
	Blair	Dike	RP	
Mr. and Mrs.	Blavatnik	Len	LG	
	Bono and Ali Hewson		LG	
	Bowes	Frances	RV	
Mr. and Mrs.	Brant	Peter	LG	2
	Breus	Shalva	VG	
Mr. and Mrs.	Broad	Eli	LG	2
	Brown and Nicolai Ouroussoff	Cecily	LG/RP	0
	Brown and John Melick	Eric	RP	2
	Bullock	Janna	LN	
	Bundchen and Tom Brady	Gisele	LG	
	Bush	Barbara	LG/MD	
	Bush	Lauren	LG/MD	
	Busson	Arki	VG	
Mr.	Burgess	Rupert	LG	
	Bushnell	Candace	LG	
	Butler and David Schafer	Cornelia	RD	0
	Butler	Gerry	VG	
	Calicchio	Denise LeFrak	LN	
	Carmignac	Edouard	VG	0
Mr. and Mrs.	Carter	Graydon	LG	
	Carter and Beyonce Knowles	Sean	LG	
	Casdin	Alex	VG	
	Castellani	Valentina	GG	1
	Catone	Gabriel	VG	1
	Chatila	Abdallah	VG	
	Chebotarev	Leeza	GG	0

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Richard Prince
November 8, 2008
Gramercy Park Hotel

TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	Chigirinsky	Shalva	VG	
	Christiansen	Helena	LG	
	Cicognani	Pietro	VG	
	Cisneros	Ella	VG	
	Coca Moroder	Borja	VG	
	Cohen	Adam	GG	1
	Cohen and guest	Lyor	RP	
	Cohen	Pippa	ML	1
Mr. and Mrs.	Cohen	Steven	LG/RP	
Mr.	Colacello	Bob	LG	
	Coleman	Candy	GG	1
	Colen	Dan	SR	
	Coppola	Sofia	RP	
	Costeletos	Philippe	VG	0
	Crane	Andrea	GG	0
	Cruz	Penelope	LG	
Mr.	Currin and Ms. Rachel Feinstein	John	LG/RP	2
	Dafoe	Willem	PMF	
	Dalrymple	Clarissa	RP	0
	David	Kristen	NS	
Ms.	de Kooning	Lisa	LG	
	De Niro and Grace Hightower	Robert	LG	
	De Salvo	Donna	LG	1
Mr. and Mrs.	Dean	Thompson	LG	
Mr.	Del Roscio	Nicola	LG	
	Dellal	Alex	VG	
	Dellal	Guy	VG	
Mr. and Mrs.	Delsener	Ron	LG/RP	2
Mr.	Demarchelier	Patrick	LG	
	Dent-Brocklehurst and Duncan Ward	Mollie	LG	
	Denuccio	Salvatore	VG	
	Depp and Vanessa Paradis	Johnny	LG	
	DiCaprio and guest	Leonardo	LG	
	Di Fabio	Alberto	AF	2
	D'Orazio	Sante	VG	2
	Doronin	Vladislav	LG	
	Dourdan	Gary	VG	
	Downey Jr.	Robert	CC	
	Dunn	Meredith	GG	1
	Eberle and Richard Pandiscio	Todd	LG	
Mr.	Edlis & Ms. Gael Neeson	Stefan	RP	2
	Einarsson	Gardar Eine	VG	
Mr.	Elderfield	John	LG	0
	Evans	Michael and Lise	LG/RP	
	Fakhoury	Pierre	LG	
	Falckenberg	Harald	VG	
	Fertitta	Frank	LG	
Mr. and Mrs.	Fertitta	Lorenzo	LG	
Princess	Firyal		VG	
	Fisch	Mark	VG	0
	Fischbach	Linda	LN	
	Fischi and April Gornik	Eric	LG	
	Florio	Tom	VG	

Richard Prince
November 8, 2008
Gramercy Park Hotel

TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	Foster	Carter	RD	1
	Foster and Sandy Tait	Hal	MF	2
	Franchi	Pepi Marchetti	GG	1
	Francis	Mark	GG	1
	Franco and guest	James	LG	
	Franzen	Jonathan	LG	
	Freedman	Denis	RP	0
Mr. and Mrs.	Fremont	Vincent	LG	2
	Frey	James and Maya	LG/RP	5
	Fridman	Mikhail	LG	
	Friedland	Leonid	VG	
	Fuhrman	Glenn	VG	
	Furman	Richard	VG	
	Gagosian	Larry	GG	2
	Gallagher and Edgar Clinje	Ellen	BM	2
Mr.	Gallipoli	Frank	RP	
Mr. and Mrs.	Ganek	David	LG/RP	2
	Ganek	Judie and Howard	LN	
	Garibashvili	Irakli	VG	
	Garavani and Giancarlo Giammetti	Valentino	LG	
	Garza	Ramiro and Gabriela	LG	
	Gaydamak	Katla	VG	
	Gelfand	Victoria	GG	1
Ms.	Gingeras and Piotr Uklanski	Alison M.	LG/RP	2
	Gioni	Massimiliano	VG	
Mr.	Gluckman and Ms. Tiffany Bell	Richard	LG	0
	Gol	Ishala	VG	
	Good	John	GG	1
	Gonzalez	Manuel	LN	
	Gordeev	Sergei	VG	
	Gordon and Thurston Moore	Kim	RP	2
Mr. and Ms.	Gottesman	Noam	LG	0
	Graff	Laurence	VG	
	Grant	Hugh	RP	
	Grazer	Brian	LG/CC	0
	Greenberg-Rohatyn and Nicholas Rohatyn	Jeanne	RP	2
	Grotjahn and Jennifer Guidi	Mark	LG	0
Ms.	Gund and Mr. Daniel Shapiro	Agnes	LG	0
Ms.	Halbreich	Kathy	LG	0
	Hammerstein	Simon	VG	
	Hanson	Dian	RP	
	Harland	Chris	VG	1
	Harris	Naomi	RP	1
	Harris	Nicki	LN	
	Hartnett	Josh	LG	
	Hearst	Amanda	MD/LG	1
	Hearst and Jay McInerney	Anne	MD/LG	
Mr.	Heller and guest	Sanford	LG	0
	Hilton	Nikki	LG	
	Hilton	Paris	LG	
	Hirst & Maia Norman	Damien	LG/RP	
	Hoffman	Hannah	DS	
	Hoffman and Mimi O'Donnell	Philip Seymour	LG	

Richard Prince
November 8, 2008
Gramercy Park Hotel

TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
Mr. and Mrs.	Holm	Stellan	LG/RP	2
	Holzer	Jane	AA	2
Mr. & Mrs.	Hopper	Dennis	LG	
	Hotimsky	Isabelle	LN	
	Hurst	Fern	LN	
	Hutton	Lauren	CC	0
	Iles	Chrissie	LG	
	Iseman and Svitlana Nesterova.	Fred	LG	2
	Jacobs	Marc	LG/RP	
	Jagger and L'Wren Scott	Mick	LG	
	Jimenez	Carmen	LN	
	Joannou	Dakis	LN	
Mr.	Johns	Jasper	LG	0
	Johanssen and Ryan Reynolds	Scarlett	LG	
	Johnson	Nadine	LG	1
	Jolie and Brad Pitt	Angelina	LG	
	Kanders	Warren and Allison	LG/SO	
	Kang	Kristie	VG	
	Karpidas	Pauline	RP	1
	Kelsey	John	VG	
	Kiedis	Anthony	RP/LG	
Mr.	Koons and Justine Wheeler	Jeff	LG/RP	2
	Krakoff	Reed	VG	0
Mr. and Mrs.	Kravis	Henry	LG	0
	Kydd	Johnnie Shand	RP	0
	Lasry	David and Evelyn	RP	2
	Lauren	Dylan	LG/MD	
	Lazarov	Melissa	GG	4
	Lee	Heidi	VG	2
	Lehmann	Rachel and Jean-Pierre	LN	
	LePaire	Cecile	GG	1
Mrs.	Lichtenstein	Dorothy	LG	
	Lieberman	Les	VG	
	Lindell	John	VG	
	Lis	Harry	VG	2
Mr.	Loeb	Daniel	LG	
	Lougheed and Aaron Fleischmann	Lin	LN	2
	Lowman	Nate	LG/SR	1
	Lowry	Glenn	LG	0
	Mack	Phyllis	LN	
	Mack	Sondra	LN	
	Macklowe	Harry and Linda	LG	0
	MacPherson	Elle	RP	0
	Maguire and Jen Meyer	Tobey	LG/RP	
	Mahoney	Maureen	ML	
	Manoukain	Bob	LG	0
Mr. and Mrs.	Marden	Brice	LG	0
Mr. and Mrs.	Marron	Donald	LG	0
	Marshall	Patricia	MD/LG	
	Martin	Steve and Ann	LG	
Mr.	Martinez	David	LG	1
	Mayer	John	RP	
Sir	McCartney	Paul	RP	

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Richard Prince
November 8, 2008
Gramercy Park Hotel

TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	McEwen	Adam	RP	
	McLaren and Young Kim	Malcolm	LG	0
	McWhinnie and Maria Beaulieu	John	RP	2
Mr.	Meier	Richard	LG	1
	Mellon and Christian Slater	Tamara	LG	
	Mendez	Eva	LG	1
	Meyer	Ron	VG	0
Mr. and Mrs.	Michaels	Lorne	LG	
Mr.	Minskoff	Edward and Julie	LG	2
	Moore	Frank	VG	2
	Monk	Bob	GG	1
	Morton	Peter	LG	
	Moss	Kate	RP	
Mr.	Mugrabi	Alberto	LG/RP	
	Murakami	Takashi	LG	
	Neri	Louise	GG	1
Mr. & Mrs.	Newhouse, Jr.	S.I.	LG	
Mr. and Mrs.	Niarchos	Philip	LG/RP	
	Niarchos	Stavros	LG	
Mr. & Mrs.	O'Brien	Glenn	RP	2
	Obrist	Hans-Ulrich	LG	0
	Older	David	VG	
	Olsen	Ashley	RP	
	Olsen	Mary-Kate	LG/SR	1
	Orlofsky	Sam	GG	1
	Otto	Karla	LN	
	Otto-Bernstein	Katharina	LN	
Mr. and Mrs.	Ovitz	Michael	RP	1
	Paltrow and Chris Martin	Gwyneth	LG	
Mr.	Parr and Allison Sarofim	Stuart	LG	2
Mr.	Perelman	Ronald O.	LG	1
	Peters	Tara	VG	
	Petzelt	Friedrich	RP	1
	Peyton	Elizabeth	LG/RP	
	Peyton-Jones	Julia	LG	0
	Phelan	John	VG	
Ms.	Phillips and Mr. Leon Falk	Lisa	LG/RP	
	Phillips and Josephine Meckseper	Richard	LG	2
	Picasso	Claude	LG	
	Picasso and Gilles Bensimon	Diana	LG	
Mr.	Pigozzi	Jean	LG/RP	2
	Pilati	Stefano	LN	0
M. et Mme.	Pinault	François	LG/RP	
	Pinchuk	Victor and Elena	LG	
	Pissarro	Joachim	VG	
	Pivovarov	Slava	VG	1
	Poehler and Will Arnett	Amy	RS	
	Polley	Doug	VG	
	Portman	Natalie	LG	
Ms.	Prather	Marla	LG	
	Prince	Richard	GG	2
	Rachofsky	Howard and Cindy	RV	0
	Rales	Mitch and Emily	LG	2

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Richard Prince
November 8, 2008
Gramercy Park Hotel

TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	Ratner	Brett	LG	
Mr.	Ray	Charles	LG	
	Reeves	Keanu	CC/SR	
	Reiftenbach	Marlies and Jacco	ACrane	0
Mr. and Mrs.	Reuben	Simon	LG	1
	Reuben	Lisa	LG	1
	Reyle and Aurella Sellin	Anselm	LG	
	Richardson	Andrew	LN	
	Richardson, Jen Brill, and Arty Nelson	Terry	RP	3
Mr. and Mrs.	Riggio	Leonard	LG	0
Mr. and Mrs.	Ringier	Michael	RP	0
	Robins	Craig	VG	0
Mr.	Rose and Ms. Amanda Burden	Charlie	LG	
Mr.	Rosen and Samantha Boardman	Aby	LG/RP	
	Ross	Lyn	LN	
Lord	Rothschild and Miranda Brooks	Jacob	LG	2
Mr.	Rothschild	Nathaniel	LG	
	Rower	Sandy	LG	
	Rubell	Don and Mera	LN	
	Rubenstein and guest	Inga	VG	2
	Rubin and Stephane Samuel	Robert	RP	2
	Ruscha	Ed and Danna	CC	0
	Ruth	Andrew	VG	
Mr.	Sachs	Richard	LG	
	Sagona	Marina	LG	1
	Sapirstein	Fred	VG	
	Sarkozy	Charlotte and Olivier	LG	2
	Saxe-Coburg	Rosario	RP	1
	Scarpetta	Lilly	LN	
	Scheinfeld	Jane	LN	
	Schiff	Lisa	VG	
	Schorr and Monica Condrea	Collier	RP	2
	Schwab	Katie	RV	
	Schwartzman	Allan	RV	
	Sednaoui	Elisa	LG	
	Seguin	Laurence et Patrick	LG/RP	2
	Semel	Terry and Jane	LG	0
	Semersky	Ernie & Dory	LG	
	Serra & Clara Weyergraf-Serra	Richard	LG	0
Mr.	Shafrazi	Tony	RP	1
	Shaye	Robert and Eva	LG	
	Shields	Brooke	LG	
	Silver	Joel	VG	
	Simon and Jake Paltrow	Taryn	LG	
	Simunovic	Nick	GG	1
	Singh	Ranbir	VG	
	Smith and Jerry Saltz	Roberta	LG	
Mr. and Mrs.	Soros	Georges	LG	0
	Spector and Michael Gabellini	Nancy	RP	2
	Sternthal	Rebecca	GG	1
Ms.	Stockman	Jennifer	RP	
	Sugimoto	Hiroshi	EJW	
	Sussman	Elizabeth	LG	

Richard Prince
November 8, 2008
Gramercy Park Hotel

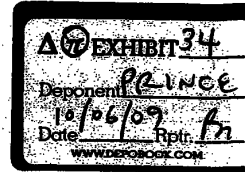
TITLE	LASTNAME	FIRSTNAME	STAFF	NUMBER
	Tananbaum	Steven and Lisa	LG	
Mr. and Mrs.	Taschen	Benedikt	RP	
Mr.	Teller and Ms. Sadie Coles	Jurgen	RP	1
Ms.	Temkin	Ann	LG	
	Tennant	Stella	RP	
	Tinterow	Gary	LG	
	Traisman	Yuri	VG	
Ms.	Turlington and Ed Burns	Christy	LG	
	Twombly	Soledad Alessandro	PMF	
	Van De Mel Tcheng	Helen	RP	0
	Van de Weghe	Christophe and Anne-Gaëlle	RP	
	Varshinsky	Mikhail	VG	
Ms.	Vogel	Carol	LG	1
	Vousden	Robin	GG	1
	Wade	Carolyn	LN	
	Wakefield	Neville	RP	
	Watts and Live Schreiber	Naomi	ACrane	0
	Wechsler	Nick	LG	2
Mr	Weinberg	Adam	LG	
	Weingarten	Andrew	VG	
Mr. and Mrs.	Weinstein	Harvey	LG	
	Weiss	Jeffrey	LG	
	West	Kanye	LG	0
	Westreich and Ethan Wagner	Thea	AA	
	Williams	Pharrell	LG	
	Wingate	Ealan and Melinda	GG	2
Ms.	Wintour	Anna	LG	
	Wool and Charlene von Heyl	Christopher	LG/RP	
	Young and Alexia Niedzielski	Aaron	SR	
	Young	Michael	AA	1
	Young	Neda	AA	1
	Zahm	Olivier	RP	
Ms.	Zellweger	Renée	LG	
	Zita	Carmen	LG	2

Schnader
ATTORNEYS AT LAW

140 BROADWAY SUITE 3100
NEW YORK, NY 10005-1101
212.973.8000 FAX 212.972.8798 schnader.com

December 11, 2008

Daniel J. Brooks
Direct Dial 212-973-8150
E-mail: dbrooks@schnader.com



**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

Mr. Richard Prince
151 Righter Road
Rensselaerville, New York 12147

BY HAND DELIVERY

Mr. Richard Prince
c/o Gagosian Gallery
555 West 24th Street
New York, New York 10011

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
AND BY HAND DELIVERY**

Gagosian Gallery
555 West 24th Street
New York, New York 10011

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
AND BY HAND DELIVERY**

Rizzoli International Publications
300 Park Avenue South, 3rd Floor
New York, New York 10010

**Re: Demand to Cease and Desist from Unauthorized Use, Exhibition and
Distribution of Copyrighted Work**

Dear Sirs:

We represent Patrick Cariou, the owner of the photographic works covered by Copyright Registration No. VA0001301506 issued November 5, 2001 and which have been published as part of a photography book entitled *Yes Rasta*. The current exhibition at the Gagosian Gallery, entitled *Canal Zone*, contains approximately twenty-two paintings by Richard Prince which incorporate unauthorized uses of Mr. Cariou's registered copyrighted work. Among the infringing works on display in the Gagosian Gallery are various untitled works, as well as, but not limited to, works entitled *Back to the Garden*, *Ile de France*, *Djuna Barnes*, etc., *Tales of Brave Ulysses*, *On the Beach*, and *Inquisition*. A book of the paintings in the *Canal Zone* exhibition, containing unauthorized reproductions of Mr. Cariou's copyrighted work, has been published by the Gagosian Gallery and is currently being distributed by Rizzoli International Publications. Unauthorized copies of Mr. Cariou's work have been used in newspaper advertisements for the *Canal Zone* exhibition, including in *The Art Newspaper*. Neither Mr. Prince, nor the Gagosian Gallery, nor Rizzoli International Publications ever asked for or received permission to use Mr. Cariou's copyrighted works.

Accordingly, each of you is violating Mr. Cariou's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, and is therefore infringing Mr. Cariou's rights.

Schnader Harrison Segal & Lewis LLP

NEW YORK PENNSYLVANIA CALIFORNIA WASHINGTON, DC NEW JERSEY DELAWARE

PHDATA3112641_1

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Schnader
ATTORNEYS AT LAW

Mr. Richard Prince
Gagosian Gallery
Rizzoli International Publications
December 11, 2008
Page 2

Demand is hereby made that each of you:

1. Cease and desist from continuing to exhibit or distribute Mr. Prince's artwork containing unauthorized reproductions of Mr. Cariou's copyrighted work.
2. Remove all unauthorized reproductions of Mr. Cariou's copyrighted work from Mr. Prince's artwork.
3. Deliver or destroy all remaining copies of the exhibition book containing Mr. Prince's artwork that is being distributed by Rizzoli International Publications.
4. Identify all of Mr. Prince's artwork containing unauthorized reproductions of Mr. Cariou's copyrighted work and the current location of each of such work.

Please be aware that remedies for copyright infringement include, but are not limited to, an award of the copyright owner's actual damages and any additional profits of the infringers, or statutory damages, as well as costs and attorney's fees, pursuant to 17 U.S.C. §§ 504 and 505. Further, due to the apparent willful nature of this infringement, additional statutory damages are available to our client.

We request a response from you or your attorneys not later than Monday, December 15, 2008.

Very truly,



Daniel J. Brooks

For SCHNADER HARRISON SEGAL & LEWIS LLP

PHDATA3112641_1

Schnader Harrison Segal & Lewis LLP

C00014



STATE OF NEW YORK)
)
) SS
COUNTY OF NEW YORK)

CERTIFICATION

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from French into English of the attached page with Bates No. C00088.

Ian Kemper, Project Manager
Geotext Translations, Inc.

Sworn to and subscribed before me

this 26th day of February, 2010.

PATRICK EVANSON
NOTARY PUBLIC-STATE OF NEW YORK
No. 01EV6201257
Qualified in Queens County
My Commission Expires February 17, 2013

From: "Patrick Cariou" <pat@patrickcariou.com>
 Subject: Re: An exhibit in New York City
 Date: August 28, 2008 11:25:52 AM EDT
 To: "christiane celle" <christianecelle@aol.com>

Hello Christiane,

Thank you very much for your interest in my work.

Of course, I know all the people that you mentioned in your email.

I do not have a gallery, and I would be interested in an exhibit.

The book *Surfer*, which has been out of print for some time, is going to be republished this year.

I also have another book, on gypsies, that I just finished after ten [years] of work.

Perhaps that will interest you.

Best,

Patrick

CELL PHONE NO. IN PARIS 0033632417641

8/28/2008 Christiane Celle <christianecelle@aol.com>

Hello Patrick,

My name is Christiane Celle. We have never met, but I am familiar with your photographs.

I have been living in New York City for 20 years, residing for some years in St. Barth, where I started a store, CALYPSO.

Then I met Antoine Verglas, who is a photographer—perhaps you know him.

We have 2 children ages 14 and 12 years old, and have been living together in New York City ever since.

I created Calypso in 1992 in St. Barth, and I sold it in 2007.

I decided to change hats and open a gallery in New York City.

The first show will be in November. You can look for it online at www.vincentfournier.com. He has an exhibit right now at Acte 2 in Paris and [will have] one in Tokyo in October.

Would you be interested in discussing the possibility of an exhibit in New York City?

I also have a gallery that is opening in Gustavia, St. Barth, and I am starting with a show of the work of Tony C., who is an unknown for you.

Tony worked with Peter Beard for years. Peter showed him how to do his diaries, and Tony makes prints from those diaries.

The theme is surfing, as he has almost 60 [prints of surfing], and in May, he was a longboard champion.

I also thought that I could do an exhibit showing Tony's work and some of your surfing photos as well.

Finally, I wanted to know if you would be interested or if you have an exclusive relationship with someone.

I also know Thierry Des Fontaines, who was your assistant for a short time.

He is living in Brazil now, but he has a website that you should look at.

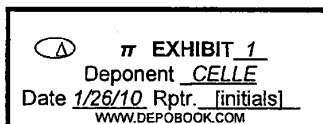
It is devoted to sports.

Thierry was my boyfriend in NYC for a few years.

That's it!

If you can give me a telephone number, I would be pleased to give you a call.

Christiane



From: "Patrick Carlou" <pat@patrickcarlou.com>
 Subject: Re: une expo a nyc
 Date: August 28, 2008 11:26:52 AM EDT
 To: "christiane celle" <christianecelle@aol.com>

Bonjour, Christiane

Merci beaucoup pour l'intérêt que tu portes à mon travail

Bien sûr je connais tous les gens que tu cites dans ton mail

Je n'ai pas de gallery et je serais intéressé par une expo

Le livre surfer qui est épuisé depuis longtemps va être républié cette année

Je suis aussi un autre livre que je viens de finir après dix ans de travail sur les gitans

Celui peut être intéressant

best

patrick

N° CELL IN PARIS 0033832417641

2008/8/28 christiane celle <christianecelle@aol.com>
 bonjour Patrick .

Je suis Christiane celle . nous ne nous sommes jamais rencontrés mais je connais tes photos.
 Je vis à nyc depuis 20 ans avec un séjour de quelques années à st barth où j'ai commencé une cie CALYPSO
 j'ai ensuite rencontré Antoine Vergias qui est photographe et que tu connais peut être
 nous avons 2 enfants 14 et 12 ans et nous vivons ensemble à nyc depuis

j'ai créé calypso en 1992 à st barth et je l'ai vendu en 2007
 j'ai décidé de changer de cap et d'ouvrir une galerie à nyc
 le premier show sera en novembre tu peux regarder online www.vincentfourrier.com il y a une expo maintenant chez acte 2 à paris et une à tokyo en octobre

serais tu intéressé de discuter une possibilité d'expo à nyc

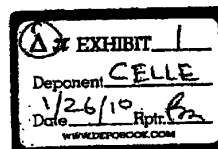
j'ai aussi une gallery qui ouvre à gustavia st barth et je commence avec un show de tony p qui est inconnu pour toi
 tony a travaillé avec peter beard pendant des années peter lui a montré comment faire ses diapos.
 et tony fait des prints de ces diapos
 le thème est le surf car il a presque 60 ans mais a été un champion de long board

j'ai pensé aussi que je pourrais faire un expo en montrant tony et certaines de tes photos de surf aussi

enfin je voulais savoir si tu étais intéressé ou si tu avais une exclusivité avec quelqu'un

je connais aussi thierry des fontaines qui t'a assisté pendant un petit moment
 il vit au Brésil maintenant il a un site tu devrais regarder
 il est consacré au sport

thierry était mon boyfriend à nyc pendant quelques années
 voilà
 si tu peux me donner un numéro de tel je serais ravi de te téléphoner
 christiane



C00088

Daniel J. Brooks
Eric A. Boden
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, New York 10005-1101
Telephone: (212) 973-8000
Facsimile: (212) 972-8798

Attorneys for Plaintiff Patrick Cariou

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICK CARIOU,	X	
	:	
Plaintiff,	:	
	:	08 Civ. 11327 (DAB)
-against-	:	
	:	
RICHARD PRINCE, GAGOSIAN GALLERY, INC., LAWRENCE GAGOSIAN and RIZZOLI INTERNATIONAL PUBLICATIONS, INC.,	:	<u>DECLARATION OF ERIC DOERINGER</u>
	:	
Defendants.	:	
	X	

ERIC DOERINGER, under the penalty of perjury, states as follows:

1. Since graduating from Brown University in 1996, I have pursued a living as a visual artist. I submit this declaration, based upon personal knowledge, in support of the motion of plaintiff Patrick Cariou for summary judgment against the defendants Richard Prince, Gagosian Gallery, Inc. (“Gagosian Gallery”), and Lawrence Gagosian.

2. Beginning in 2001, as part of my *Bootleg* project, I appropriated images derived from the paintings of various contemporary artists, including John Currin, and incorporated those images into new artworks, which I created.

3. I adapted and transformed the images which I appropriated from John Currin, in the process creating new works of art that were mine. In doing so, it was my intention to pay tribute to Mr. Currin and to his stature in the art world.

4. The images I took from Mr. Currin's paintings were scanned from art books or magazines, printed on a standard inkjet printer and then cut out by hand. To create the Currin *Bootlegs*, I painted a background on a canvas, collaged the cutout print of the image onto the canvas, and covered the entire canvas with a clear acrylic medium to create a brush stroke texture simulating a hand-painted canvas. In doing so, I believed I was giving voice to a new artistic expression, with a different feeling and message, and a new work of art, in a different medium, that was uniquely mine. The use I made of Mr. Currin's imagery was within a long tradition of appropriation art, in which Richard Prince figures prominently, which features the artist's use of found objects and images created by others which are recontextualized into a new work of art.

5. On November 10, 2005, I received, by registered mail, return receipt requested, a letter from a law firm (Sidley Austin Brown & Wood LLP), stating that it represented Gagosian Gallery which in turn represented John Currin. The letter demanded that I immediately cease and desist from reproducing and selling unauthorized copies of Mr. Currin's works and that I sign a copy of the letter in order "to warrant that you have, and will not at any time in the future, distribute, prepare derivative works or reproduce copies of Mr. Currin's works." The letter also warned me that the reproduction and sale of copies of Mr. Currin's paintings was a "willful violation of the Copyright Act, 17 U.S.C. §§ 101 *et seq.*" I was threatened with "an award of statutory damages of up to \$150,000." The letter stressed that: "Gagosian Gallery and Mr. Currin take violations of their rights very seriously and they intend to

fully enforce their rights if you fail to comply with our demands.” A copy of this letter is attached hereto as Exhibit A.

6. Feeling extremely intimidated, I wrote back immediately, noting that I believed I was within my rights in creating artworks incorporating imagery derived from Mr. Currin’s paintings, but agreeing to stop selling the paintings. After expressing my admiration for Mr. Currin, I did, however, ask for Mr. Currin’s permission to reproduce images of my paintings based upon his work in the documentation of my *Bootleg* project and to exhibit existing paintings in non-commercial settings, for purely educational purposes and without offering the paintings for sale. A copy of this letter is attached hereto as Exhibit B.

7. On November 28, 2005, the Sidley firm replied, rejecting my request that I be permitted to display my Currin works for non-commercial purposes, and reiterating that if I reproduced and sold “copies of the works of John Currin and/or distribut[ed] derivative copies of such works,” I would be sued for copyright infringement. A copy of this letter is attached hereto as Exhibit C.

8. I complied with the Gagosian Gallery’s threat and ceased displaying, exhibiting and selling my Currin *Bootlegs*.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 6, 2010, at Brooklyn, New York.


ERIC DOERINGER

SIDLEY AUSTIN BROWN & WOOD LLP

BEIJING
BRUSSELS
CHICAGO
DALLAS
GENEVA
HONG KONG
LONDON

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FOUNDED 1866

LOS ANGELES
NEW YORK
SAN FRANCISCO
SHANGHAI
SINGAPORE
TOKYO
WASHINGTON, D.C.

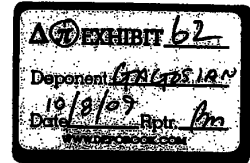
WRITER'S DIRECT NUMBER
(212) 839-7357

WRITER'S E-MAIL ADDRESS
ptaren@sidley.com

November 10, 2005

By Registered Mail, Return Receipt Requested

Eric Doeringer
521 Dean St., #6
Brooklyn, NY 11217-2134



Re: John Currin

Dear Mr. Doeringer:

We represent Gagosian Gallery which in turn represents the painter John Currin. It has come to the attention of Gagosian Gallery and Mr. Currin that you are reproducing and selling unauthorized copies of Mr. Currin's paintings including "Pelletiere" and "The Moved Over Lady."

The reproduction and sale of copies of Mr. Currin's paintings constitutes a willful violation of the Copyright Act, 17 U.S.C. §§ 101 *et seq.* You should be aware that in such cases the Act provides that the Copyright owner may be entitled to an award of statutory damages of up to \$150,000.

We hereby demand that you immediately cease and desist from reproducing and selling unauthorized copies of the works of John Currin. In connection thereto we ask that you sign and return a copy of this letter by November 21, 2005, to warrant that you have, and will not at any time in the future, distribute, prepare derivative works or reproduce copies of Mr. Currin's works.

Gagosian Gallery and Mr. Currin take violations of their rights very seriously and they intend to fully enforce their rights if you fail to comply with our demands.

SIDLEY AUSTIN BROWN & WOOD LLP

NEW YORK

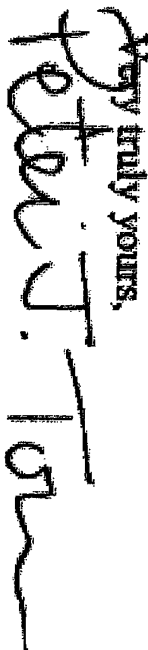
Eric Doeringer

November 10, 2005

Page 2

Nothing in this letter should be construed as a waiver of any rights or remedies available to Gagosian Gallery and Mr. Currim and they hereby expressly reserve their rights to pursue any rights or remedies available to them under the law.

Very truly yours,



Peter J. Toren

~~Kara Vander Weg~~

Agreed to: _____

Eric Doeringer
521 Dean Street #6
Brooklyn, NY 11217
(718) 398-1981

Peter J Toren
Sidley Austin Brown & Wood
787 Seventh Avenue
New York, NY 10019

Dear Mr. Toren,

Although I believe I am within my rights to create artworks incorporating imagery derived from the paintings of John Currin, I have the utmost respect for Mr. Currin. My paintings are a tribute to his stature in the art world. If he wishes that I stop selling these paintings, I will comply. I have contacted all galleries currently holding these works and requested that they withdraw the paintings from sale.

I would like to ask Mr. Currin's permission to reproduce images of my paintings based upon his work in the documentation of my "Bootleg" project and to exhibit existing paintings in non-commercial settings.

Yours truly,



Eric Doeringer

SIDLEY AUSTIN BROWN & WOOD LLP

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WASHINGTON, D.C.

WRITER'S DIRECT NUMBER
(212) 839-7357

WRITER'S E-MAIL ADDRESS
ptoren@sidley.com

November 28, 2005

Registered Mail, Return Receipt Requested

Eric Doeringer
521 Dean St., #6
Brooklyn, NY 11217-2134

Re: John Currin

Dear Mr. Doeringer:

I write in response to your letter in which you agreed that you would immediately cease and desist from reproducing and selling unauthorized copies of the works of John Currin and from distributing derivative copies of Mr. Currin's works. In return for this, Gagosian Galleries agrees not to bring a copyright infringement action against you for the reproduction and sale of such unauthorized works for as long as you do not violate the terms of this agreement. To the extent that you violate the terms of this agreement by reproducing and selling copies of the works of John Currin and/or distributing derivative copies of such works, Gagosian Galleries shall have the right to terminate this agreement and may bring an action for copyright infringement seeking damages for all past infringements.

After due consideration our client has reject your request that you be permitted to continue to reproduce images "of the works previously executed for the non-commercial purposes of documenting my 'bootleg' painting project . . ."