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Gagosian Gallery, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

SAFFLANE HOLDINGS LTD., and
ROBERT WYLDE,

Plaintiffs,

-against-

GAGOSIAN GALLERY, INC.,

Defendant.

-----X

GAGOSIAN GALLERY, INC.,

Third-Party Plaintiffs,

-against-

CHARLES COWLES,

Third-Party Defendant.

-----X

Case No.: 11 CIV 1679 (DLC)(MHD)

**DECLARATION OF DARA G.
HAMMERMAN IN SUPPORT OF
DEFENDANT/THIRD-PARTY
PLAINTIFF'S REPLY MEMORANDUM
OF LAW IN RESPONSE TO CHARLES
COWLES' OPPOSITION TO
MOTION FOR DEFAULT JUDGMENT
AND TO THE DAMAGES
DEMONSTRATED BY GAGOSIAN
GALLERY, INC. IN THE SAFFLANE
INQUEST PROCEEDING**

DARA G. HAMMERMAN, being duly sworn, deposes and says:

1. I am a member of the bar of the state of New York and of this Court and an associate at the law firm of Withers Bergman LLP ("Withers"), attorneys for Defendant/Third-Party Plaintiff Gagosian Gallery, Inc. in this action.

2. Annexed hereto as Exhibit A is a true and correct copy of the Affidavit for Judgment by Confession of Charles Cowles, dated September 2, 2010.

3. Annexed hereto as Exhibit B is a true and correct copy of relevant excerpts from the deposition of Charles Cowles, taken on July 13, 2011.

4. Annexed hereto as Exhibit C is a true and correct copy of Charles Cowles' letter to John Good, dated November 19, 2009.

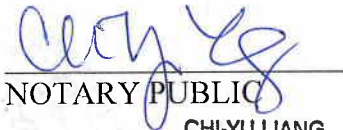
5. Annexed hereto as Exhibit D is a true and correct copy of relevant excerpts from the deposition of John Good, taken on September 23, 2011.

6. Annexed hereto as Exhibit E is a true and correct copy of the Stipulation of Dismissal, which was executed by counsel for Saffane Holdings, Ltd., Robert Wylde, and Gagosian Gallery, Inc. on October 18, 2011, and so ordered by Magistrate Judge Dolinger on November 4, 2011.



Dara G. Hammerman

Sworn to before me this
24th day of February, 2012



NOTARY PUBLIC

CHI-YU LIANG
Notary Public, State of New York
No. 02LI6146786
Qualified in New York County
Commission Expires July 22, 20 14