

AARON RICHARD GOLUB, ESQUIRE, PC
Attorneys for Plaintiffs
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ARG 6056

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X 11-CIV-1679 (DLC)

SAFFLANE HOLDINGS LTD., and
ROBERT WYLDE,

Plaintiffs,

-against-

**PLAINTIFFS' INITIAL
DISCLOSURES PURSUANT TO
FRCP 26(a)(1) CONCERNING
THE PAINTING BY RICHARD
PRINCE ENTITLED "THE
MILLIONAIRE NURSE"**

GAGOSIAN GALLERY, INC.

Defendant.

-----X

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the So Ordered Coordination Stipulation, dated June 6, 2011, plaintiffs SAFFLANE HOLDINGS LTD., and ROBERT WYLDE, by their attorney, AARON RICHARD GOLUB, ESQUIRE, PC, hereby make the following initial disclosures. Pursuant to Rule 26(e)(1) Plaintiffs reserve their right to supplement and/or amend their initial disclosures, as appropriate, prior to trial:

WITNESSES

FRCP Rule 26 (a)(1)(A)(i) The following individuals are likely to have discoverable information relevant to the claims, defenses and allegations at issue in the above captioned action:

1. Robert Wylde
c/o Aaron Richard Golub, Esquire, PC
34 East 67th Street - 3rd Floor
New York, New York 10065
T: 1-212-838-4811

Including but not limited to information concerning the transaction between plaintiff Wylde and defendant related to the following painting:

Millionaire Nurse

RICHARD PRINCE (b. 1949) ("Prince")
Signed, titled and dated 2002 on the overlap
Ink jet print and acrylic on canvas
58 x 36 in. (147.3 x 91.4 cm.) ("Prince
Painting")

2. Lawrence Gilbert Gagosian a/k/a Larry Gagosian
c/o Gagosian Gallery, Inc.
West 24th Street
555 West 24th Street
New York, NY 10011
T: 1-212-741-1111
Including but not limited to: provenance;
relationship with Prince; level of knowledge or
information exchanged between dealer and artist;
status and creation of the Prince Painting;
background and history of the Prince Painting;
oeuvre of Prince's work; information concerning
the transaction between plaintiff Wylde and
defendant related to the Prince Painting;
information concerning the transaction between
the currently unknown third party purchaser of
the Prince Painting ("Third-Party Purchaser") and
defendant.
3. John Good
c/o Gagosian Gallery, Inc.
West 24th Street
555 West 24th Street
New York, NY 10011
T: 1-212-741-1111
Including but not limited to information
concerning the transaction between plaintiff
Wylde and defendant related to the Prince
Painting, and information concerning the
transaction between the Third-Party Purchaser and
defendant relating to the Prince Painting.

4. Subject to further discovery, the currently unknown Third-Party Purchaser of the Prince Painting.
Third-Party Purchaser has information, including but not limited to, information concerning the transaction between Third-Party Purchaser and defendant related to the Prince Painting.
5. Richard Prince
Address presently unknown.
Including but not limited to: provenance; relationship with defendant Gagosian Gallery; relationship with prior dealer; level of knowledge or information exchanged between dealer and artist; status and creation of the Prince Painting; intention in creating the Prince Painting; background and history of the Prince Painting; oeuvre of the artist's work; the transaction between plaintiff Wylde and defendant related to the Prince Painting; the transaction between defendant and the Third-Party Purchaser related to the Prince Painting.
6. Barbara Gladstone
Last known address is:
c/o Gladstone Gallery
515 West 24th Street
New York, NY 10011
T: 212-206-9300
-and-
c/o Gladstone Gallery
530 West 21st Street
New York, NY 10011 USA
T: 212-206-7606
Including but not limited to: provenance; relationship with Prince; level of knowledge or information exchanged between dealer and artist; status and creation of the Prince Painting; background and history of the Prince Painting; oeuvre of Prince's work; information concerning the Prince Painting; information concerning the transaction between plaintiffs and defendant related to the Prince Painting; and information concerning the transaction between defendant and the Third-Party Purchaser related to the Prince Painting.

7. Subject to further discovery, unnamed current and former staff and/or other personnel at Gagosian Gallery, Inc., who have relevant information, including but not limited to information regarding the claims, defenses and allegations at issue, including but not limited to information concerning the Prince Painting, and the transaction between plaintiff Wylde and defendant related to the Prince Painting, the transaction between defendant and the Third-Party Purchaser related to the Prince Painting and information concerning defendant Gagosian Gallery's business policies and practices concerning agreements to sell works of art.
8. Subject to further discovery, any and all attorneys who represented any party herein and the Third-Party Purchaser, during the relevant time period concerning the Prince Painting.

DOCUMENTS

FRCP Rule 26 (a) (1) (A) (ii) A description by category and location of, all documents, data compilations and tangible things in the possession, custody or control of the party relevant to the claims, defenses and allegations in the above captioned action:

1. Plaintiffs' communications with defendant concerning the Prince Painting.
2. Documents concerning the Prince Painting and the purchase of the Prince Painting, including without limitation contracts between Plaintiffs and Defendant.
3. Plaintiffs reserve the right to use any document, data or information produced by defendant and/or any third party in this action.

Documents are located at plaintiffs' counsel's office:

Aaron Richard Golub, Esquire, PC
34 East 67th Street - 3rd Floor
New York, New York 10065
T: 1-212-838-4811

DAMAGES

FRCP Rule 26 (a) (1) (A) (iii) A computation of damages:

Plaintiffs' damages include, subject to expert testimony, the value of the Prince Painting at the time of trial.

INSURANCE

FRCP Rule 26 (a) (1) (A) (iv) Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy a judgment:

Plaintiffs have no insurance policy that could be used to satisfy any part of a judgment in this case.

Dated: New York, New York
June 24, 2011

Respectfully submitted,

s/Aaron Richard Golub
AARON RICHARD GOLUB, ESQUIRE, P.C.
Attorneys for Plaintiffs
34 East 67th Street - 3rd Floor
New York, New York 10065
ph: 212-838-4811
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ARG 6056

To: WITHERS BERGMAN LLP
Attorneys for Gagosian Gallery, Inc.
430 Park Avenue, 10th Floor
New York, New York 10022-3505
(212) 848-9800

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SOUTHERN DISTRICT OF NEW YORK

11-CIV-1679 (DLC)

SAFFLANE HOLDINGS LTD., and
ROBERT WYLDE,

Plaintiffs,

-against-

GAGOSIAN GALLERY, INC.

Defendant.

=====**NOTICE OF ENTRY**=====

PLEASE take notice that the within is a (certified) true copy of a

duly entered in the office of the clerk of the within named court on

Dated,

Yours, etc.

Attorney for

Office and Post Office Address
Aaron Richard Golub, Esquire, P.C.
34 East 67th Street-3rd Floor
New York, New York 10065

To

Attorney(s) for

=====**NOTICE OF SETTLEMENT**=====

PLEASE take notice that an order of which the within is a true copy will be presented for settlement to the Hon.

on

at M.

Dated,

Yours, etc.

Attorney for

Aaron Richard Golub, Esquire, P.C.
34 East 67th Street - 3rd Floor
New York, New York 10065

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FRCP 26(a)(1) CONCERNING THE PAINTING
BY RICHARD PRINCE ENTITLED
"THE MILLIONAIRE NURSE"

Attorneys for Plaintiffs

Office and Post Office Address, Telephone
Aaron Richard Golub, Esquire, P.C.
34 East 67th Street - 3rd Floor
New York, New York 10065
212-838-4811

To

Attorney(s) for

Service of copy of the within is hereby admitted

Dated

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Attorney(s) for