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DATE FILED: (6/6/2011

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SAFFLANE HOLDINGS LTD., and ROBERT WYLDE.

Plaintiffs,

-against-

GAGOSIAN GALLERY, INC.

Defendant.

COORDINATION STIPULATION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE METROPOLITAN MUSEUM OF ART AND JAN COWLES,

Plaintiffs,

-against-

SAFFLANE HOLDINGS LTD. AND ROBERT WYLDE

Defendants.

11-CIV-3143 (DLC)

11-CIV-1679 (DLC)

SO ORDERED

SO ORDERED COORDINATION STIPULATION

IT IS HEREBY STIPULATED AND ORDERED as follows:

- The above-captioned actions pending in the Court are hereby coordinated for all
 pre-trial purposes before this Court. These actions shall be referred to herein as "Coordinated
 Actions." The Pre-trial Scheduling Order (the "Order") shall apply as specified to the
 Coordinated Actions.
- 2. The parties in the Coordinated Actions will coordinate discovery to avoid duplication of time and expense, as follows:
 - a. Deposition witnesses in one action may be examined by counsel in the other

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action, and the same witness will not be required to give testimony separately in both actions except for good cause shown. This applies to party witnesses and third-party witnesses alike.

- b. Each document produced in the Coordinated Actions shall be produced to counsel for all parties in the Coordinated Actions.
- c. Any and all discovery (including but not limited to documents produced, interrogatory responses, depositions, third-party discovery, and expert discovery) conducted, obtained, or provided by any party or non-party in the Coordinated Actions may be used by any party in the Coordinated Actions, at any phase of the Coordinated Actions.
- d. The coordination of discovery as set forth in this Coordination Stipulation and Order shall only apply to the claims concerning the Mark Tansey painting entitled, "The Innocent Eye Test," which have been asserted in the Coordinated Actions, and shall not apply to the claims concerning the Richard Prince painting entitled, "The Millionaire Nurse," which have been asserted in the Safflane Holdings Ltd. and Robert Wylde v. Gagosian Gallery, Inc., 11-CIV-1679, matter.

IT IS FURTHER STIPULATED AND AGREED that a facsimile or electronic signature on this document shall have the same force and effect as an original signature.

AARON RICHARD GOLUB, ESQUIRE, PO
Attorneys for Safflane Holdings Ltd. and
Robert Wylde
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By:	Ву:
Aaron Richard Golub, Esq.	Hollis Bart, Esq.
Aaron Richard Golub, Esq. Dated: May 3/, 2011	Dated: May, 2011

So ardered. June 4, 2011

-2-

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b. Each document produced in the Coordinated Actions shall be produced to counsel for all parties in the Coordinated Actions.

Any and all discovery (including but not limited to documents produced,

interrogatory responses, depositions, third-party discovery, and expert discovery) conducted,

obtained, or provided by any party or non-party in the Coordinated Actions may be used by

any party in the Coordinated Actions, at any phase of the Coordinated Actions.

The coordination of discovery as set forth in this Coordination Stipulation

and Order shall only apply to the claims concerning the Mark Tansey painting entitled, "The

Innocent Eye Test," which have been asserted in the Coordinated Actions, and shall not apply

to the claims concerning the Richard Prince painting entitled, "The Millionaire Nurse," which

have been asserted in the Safflane Holdings Ltd. and Robert Wylde v. Gagosian Gallery, Inc.,

11-CIV-1679, matter.

IT IS FURTHER STIPULATED AND AGREED that a facsimile or electronic signature on this

document shall have the same force and effect as an original signature.

AARON RICHARD GOLUB, ESQUIRE, PC Attorneys for Safflane Holdings Ltd. and Robert Wylde 34 East 67th Street, 3rd Floor New York, New York 10065

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Aaron Richard Golub, Esq.

Dated: May _____, 2011

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Emerica Vant

Dated: May

-2-

PATTERSON BELKNAP WEBB & TYLER LLP Attorneys for The Metropolitan Museum of Art 1133 Avenue of the Americas New York, New York 10036 (212) 336-2000

Ву:				
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SNR DENTON LLP

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1221 Avenue of the Americas

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John D. Winter, Esq.

Dated: May Jul , 2011

U.S.D.J.

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Dated: May 3 1 , 2011

By:	
John D. Winter, Esq.	
Dated: May, 2011	
SO ORDERED	

U.S.D.J.