

**UNITED STATES U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ATHENA ART FINANCE CORP.,

Plaintiff,

-against-

that

CERTAIN ARTWORK BY JEAN-MICHEL
BASQUIAT ENTITLED HUMIDITY, 1982,
in Rem,

Defendants.

SATFINANCE INVESTMENT LIMITED
and DELAHUNTY LIMITED d/b/a
DELAHUNTY FINE ART,

Interested Parties.

20-CV-04669 (GBD) (VF)

SATFINANCE INVESTMENT LIMITED

Intervenor-Plaintiff,

-against-

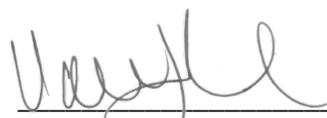
ATHENA ART FINANCE CORP. and that
CERTAIN ARTWORK BY JEAN-MICHEL
BASQUIAT ENTITLED HUMIDITY, 1982,
in Rem,

Intervenor-Defendants.

VALERIE FIGUEREDO, United States Magistrate Judge:

The court received the following letter on December 13, 2022, which the parties indicated at a conference held on January 18, 2023, that they had not received.

DATED: January 18, 2023



VALERIE FIGUEREDO
United States Magistrate Judge

律政司
國際法律科
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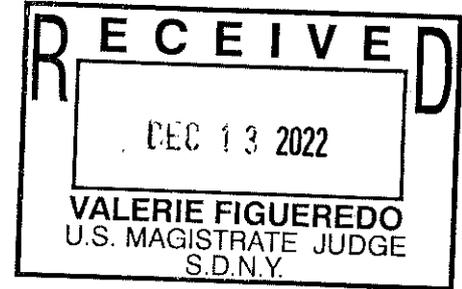
本司檔號 Our Ref. : LR(CIV)045/22(USA)IN
來函檔號 Your Ref. : 20-cv-4669(GBD)(VF)
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BY POST

United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007
The United States of America

30 November 2022

Attn: Honourable Valerie Figueredo,
United States Magistrate Judge



Dear Sir/Madam,

**Letter of Request for Legal Assistance in a Civil Matter in relation to
Case No. 20-cv-4669(GBD)(VF)**

We refer to the Letter of Request issued by the United States District Court Southern District of New York on 13 May 2022 ("Request") and transmitted to us through the Consulate General of the United States of America, Hong Kong under note verbale dated 11 October 2022.

We note from the Request that our assistance is sought in obtaining evidence from Charles Mark Broadley ("Broadley"). In order for us to consider the matter, we should be grateful if you would clarify the involvement of Broadley in this matter and his relationship with the parties to the proceeding. It is noted that Inigo Philbrick Limited ("IPL") acquired the subject painting from the Phillips auction house in 2016 while IPL, Inigo Philbrick and 18 Boxwood Green Limited ("Boxwood") represented to the Plaintiff that Boxwood had full ownership and title to the subject painting. Kindly clarify when Boxwood acquired the subject painting from IPL and from whom the intervenor-plaintiff acquired 50% of the subject painting according to its allegation.

While this Department may render assistance in executing the Request, the parties may consider retaining HKSAR law firms as their agents to make the court application in the HKSAR. Retaining a HKSAR law firm as agent is likely to facilitate the obtaining of the requested documents and/or evidence from the witness. The parties may also participate in the questioning of the witness through their HKSAR lawyers. For information, the list of law firms in the HKSAR can be found at the website of The Law Society of Hong Kong (<https://www.hklawsoc.org.hk/en/Serve-the-Public/The-Law-List/Hong-Kong-Law-Firms>). If such course is pursued, the name of the local agent should be incorporated in a revised letter of request so that the revised letter of request can be transmitted to the named local agent for making appropriate application to the HKSAR Court. In such circumstances, this Department would not be involved in the matter.

If you have any queries to the above, please do not hesitate to contact the undersigned.

Yours faithfully, 

(Miss Osa Chan)
Senior Government Counsel
Mutual Legal Assistance Unit
International Law Division

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