UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LÉONE MEYER,

Plaintiff,

-against-

THE BOARD OF REGENTS OF THE UNIVERSITY OF OKLAHOMA, DAVID L. BOREN IN HIS CAPACITY AS THE PRESIDENT OF THE UNIVERSITY OF OKLAHOMA, THE UNIVERSITY OF OKLAHOMA FOUNDATION, INC., DAVID FINDLAY GALLERIES, INC., DAVID FINDLAY JR., INC., WALLY FINDLAY GALLERIES (NEW YORK), INC., WALLY FINDLAY GALLERIES INTERNATIONAL DEVELOPMENT CORP., DFG ART CORP. FINDLAY ART CONSIGNMENTS, INC., FINDLAY GALLERIES, INC.,

No. 13 Civ. 3128 (CM)

Defendants.

DECLARATION OF CHRIS A. PURCELL

- I, Chris A. Purcell, hereby declare as follows:
- 1. I am over the age of eighteen years old and am otherwise competent to make this Declaration. I make this declaration in support of Defendants the Board of Regents of the University of Oklahoma, David L. Boren in his capacity as President of the University of Oklahoma, and the University of Oklahoma Foundation, Inc.'s ("Oklahoma Defendants") Motion to Dismiss Plaintiff's Complaint. I have personal knowledge of the facts stated in this Declaration, and could testify to the truth of such facts if called upon to do so.
- 2. I currently serve as Executive Secretary to the Board of Regents and Vice President for University Governance of the University of Oklahoma. I have served as Executive Secretary to the Board of Regents and Vice President for University Governance of the University of Oklahoma since 2002.
- 3. The University of Oklahoma is not incorporated, registered, authorized, or licensed to do business in New York.

- 4. The University of Oklahoma has no agent for the receipt of service of process in New York.
- 5. The University of Oklahoma does not file any administrative reports with the State of New York.
- 6. The University of Oklahoma does not have any bank accounts, employees or own any assets in New York.
- 7. The University of Oklahoma does not maintain any campuses, offices, telephone numbers or mailing addresses in New York.
- 8. The University of Oklahoma does not have a contract with and is not a member of the Association of Art Museum Directors.

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

Executed this day of February, 2014 at Norman, Oklahoma.

Chris A. Purcell

Jassoriked and. Lebruary, 2014.

Srie McKay

"/7/17