

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 INDIVIDUAL
CAPACITY, DAVID L. BOREN IN HIS CAPACITY AS THE
PRESIDENT OF THE UNIVERSITY OF OKLAHOMA, THE
UNIVERSITY OF OKLAHOMA FOUNDATION, INC., DAVID
FINDLAY GALLERIES, INC., WALLY FINDLAY
GALLERIES (NEW YORK), INC., WALLY FINDLAY
GALLERIES INTERNATIONAL DEVELOPMENT CORP.,
DFG ART CORP. FINDLAY ART CONSIGNMENTS, INC.,
FINDLAY GALLERIES, INC., THE AMERICAN ALLIANCE
OF MUSEUMS, THE ASSOCIATION OF ART MUSEUM
DIRECTORS.

Defendants.

No. 13 Civ. 3128 (CM)

DECLARATION OF GUY L. PATTON

I, Guy L. Patton, 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 President of the University of Oklahoma Foundation, Inc. ("Foundation"). I have served as President of the Foundation since 2007.

3. The Foundation is an independent not for profit Oklahoma corporation exempt from federal income taxation under § 501(c)(3) of the Internal Revenue Code and was formed and exists to receive contributions for the benefit of the University of Oklahoma, which is the

Foundation's exclusive beneficiary. The Foundation was incorporated under the laws of Oklahoma and maintains its principal place of business in Norman, Oklahoma.

4. The Foundation has no agent for the receipt of service of process in New York.

5. The Foundation does not file income tax returns or any administrative reports with the State of New York. The Foundation is licensed to and has occasionally received contributions from New York residents.

6. The Foundation has an investment account with Bank of New York ("BNY") Mellon that is serviced by BNY Mellon representatives in New York and Pittsburgh. The Foundation does not have any primary bank accounts, employees or own any assets in New York. The Foundation does not solicit business in New York.

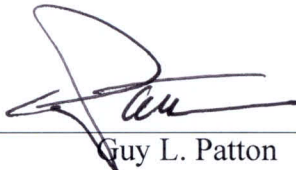
7. The Foundation does not maintain any offices, telephone numbers or mailing addresses in New York.

8. The Foundation does not have a contract with and is not a member of the American Alliance of Museums. The Foundation does not have a contract with and is not a member of the Association of Art Museum Directors.

9. The Camille Pissaro painting entitled *Bergère reentrant des moutons* (Shepherdess Bringing in Sheep), 1886, oil on canvas, 18 1/4 in. x. 15 in. (the "Painting") is owned by the Foundation and is currently on permanent display at the University of Oklahoma's Fred Jones, Jr. Museum of Art.

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 7 day of February, 2014 at Norman, Oklahoma.



Guy L. Patton