

1           36. Plaintiff is informed and believes and thereon alleges that the Julien Defendants  
2 and the Jackson Defendants reached a secret agreement which permits Defendants to conduct a  
3 new auction at a time Defendants deem more profitable.

4           37. On or about April 15, 2009, Defendants purported to "cancel" the No Reserve  
5 Michael Jackson Auction, despite having accepted bids on a no-reserve basis. At the time  
6 Defendants purported to "cancel" the No Reserve Michael Jackson Auction, Plaintiff was the  
7 only, and therefore the highest, bidder on 82 items. These items are as follows:

- 8           i.       **Michael Jackson Award Doll (Lot 1289)**: Doll of Michael Jackson  
9                   wearing the outfit from his Bad video, housed in a plexiglass container on  
10                   a black base with a plaque reading "Quadruple platinum Record awarded  
11                   to Michael Jackson for the sale in Switzerland of more than 200,000 units  
12                   of 'Bad'." [Dimensions: 26 ½ by 9 by 6 inches]
- 13           ii.       **Michael Jackson Bust (Lot 1219)**: Gold painted plaster portrait bust of a  
14                   1980s Thriller-era Michael Jackson wearing aviator shades and a military  
15                   style jacket. [Dimensions: 16 by 14 by 7 inches]
- 16           iii.       **Michael Jackson Mannequin (Lot 1172)**: Custom mannequin sculpted in  
17                   the likeness of Michael Jackson wearing a black jacket, boots and black  
18                   and red pants adorned with silver buckles and straps. [Dimensions: 69 by  
19                   23 by 16 inches]
- 20           iv.       **Walt Disney Sleeping Beauty Sericel (Lot 1057)**: Silkscreen print  
21                   depicting Briar Rose in a limited edition of 2600. Dated 1990, with  
22                   certificate of authenticity. [Dimensions: 16 by 9 inches]
- 23           v.       **Minnie Mouse (Lot 1035)**: Vividly colored plastic statuette of Minnie  
24                   Mouse. [Dimensions: 10 by 8 by 6 inches]
- 25           vi.       **Plated Brass Cuirass and Nickel, Silver, and Brass (Lot 839)**: From the  
26                   British Household Cavalry. Helmet with white horsehair plume contains  
27                   the motto "Honi soit qui mal y pense." [Dimensions: Cuirass, 24 by 14 by  
28                   16 inches; helmet height, 17 inches]

- vii. **Marilyn Monroe Statue (Lot 820)**: A painted fiberglass figure of Marilyn Monroe in her famous pose over a New York subway grate from 'The Seven Year Itch'. [Dimensions: 66 by 48 by 31 inches]
- viii. **Lorenzo Ghiglieri (American, B. 1931) (Lot 547)**: Strongest Bond IV, 1983. From limited edition of 50. Bronze sculpture of a Native American woman nursing a baby. [Dimensions: Height, 20 inches]
- ix. **Composition Singe Light Torchiere (Lot 504)**: In the form of a kneeling angel. On a octagonal base. [Dimensions: 21 ½ by 11 inches]
- x. **After Antonin Mercie (Crench, 1812-1877) (Lot 489)**: "Gloria Victis," parcel gift and bronze statue mounted on a black marble socle, signed "A. Mercie" on base. [Dimensions: 99 by 58 inches]
- xi. **Statue of a Seated Girl Sewing (Lot 415)**: Bronze with colored patination. [Dimensions: Height, 30 inches]
- xii. **Mark Hopkins (American, 20th Century) (Lot 397)**: "Imagine," signed, dated '89, numbered 29/30. Bronze statue of a lying boy contemplating with a pen and paper. [Dimensions: 21 ½ by 11 inches]
- xiii. **Pair of Roman Figural Busts (Lot 325)**: Two mixed color marble busts of Roman noblemen, each attached to a square stepped socle. [Dimensions: Height: 38 inches]
- xiv. **After Antonin Mercie (French, 1812-1877) (Lot 297)**: "Gloria Victis," parcel gift and bronze statue mounted on a black marble socle, signed "A. Mercie" on base. [Dimensions: 99 by 58 inches]
- xv. **Bob Byerley (American, B. 1941) (Lot 260)**: "Cloudbuster Airlines," print by Byerley, signed in the plate and by hand in gold ink. Image depicts three children and a dog playing at flying. [Dimensions: 37 ½ by 29 ½ inches including frame]
- xvi. **David Ginzton, (American, B. 1948) (Lot 111)**: Bronze statue with colored patination of a little boy about to throw a baseball with a glove on

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- his other hand. On a wood base. Signed and dated "David Ginzton 92 @," numbered "71/80." [Dimensions: 33 by 15 by 12 1/4 inches]
- xvii. **Marble Slab (Lot 104)**: With an original poem by Michael Jackson. Surmounted by the Neverland emblem. Two pieces. [Dimensions: 62 by 84 inches]
- xviii. **Bronze Statue of Children in a Tree (Lot 91)**: Variegated patinated statue of five children in a tree, one on a moving swing, signed on base "© Giovanni P. Las Vegas NV" [Dimensions: 90 by 64 inches]
- xix. **Mark Hopkins (American, 20th Century) (Lot 56)**: "Friends in High Places." Variegated patinated bronze statue of a young girl watching two birds. Signed on base "Mark Hopkins 2001." [Dimensions: 55 by 29 inches]
- xx. **Painted Metal Bell (Lot 47)**: With pulley wheel. Painted black with gold highlights. Bolted to metal base. [Dimensions: Base, 41 by 48 inches; wheel, 29 1/2 inches; bell depth, 33 inches]
- xxi. **Bronze Sculpture of Two Boys on a Jungle Gym (Lot 36)**: Life-size, unsigned. [Dimensions: 70 by 54 inches]
- xxii. **Brass Garden Font (Lot 14)**: Featuring four winged figures and garland swags. With satyrs on base and green patination. In two parts. [Dimensions: 53 by 49 inches]
- xxiii. **Wood and Composition Neverland Sign (Lot 12)**: Decorated with a young boy talking to a tiny satyr in front of full moon. With raised gold lettering reading "Neverland Valley / Welcome." [Dimensions: 60 1/4 by 98 by 5 1/4 inches]
- xxiv. **Life-Size Patinated Metal Statue of a Young Girl Bal (Lot 4)**: Variegated patinated statue featuring a young girl in shorts and T-shirt balancing on an unseen object. [Dimensions: 50 1/2 by 33 1/2 inches]

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- xxv. Ramon Parmenter (American, B. 1954) (Lot 293): "Delights," bronze statue with colored patination of a little girl eating ice cream and holding three glass balloons. Signed; edition limited to 74 [Dimensions: Height, 27 ½ inches]
- xxvi. After Jean Antoine Houdon (French, 1741-1828) (Lot 244): "Cupid" bronze figure with colored patination, signed "Houdon." [Dimensions: Height, 26 inches]
- xxvii. Ramon Parmenter (American, B. 1954) (Lot 227): "He Loves Me," patinated bronze of a girl in a dress plucking dandelion petals. Signed "Ramon Parmenter." Numbered "27/124 @2002" [Dimensions: 14 by 8 by 10 inches]
- xxviii. Bronze Figural Group (Lot 222): Depicting Joan of Arc in a cavalry attack, signed "Darley 1903." [Dimensions: Height, 31 inches]
- xxix. Chinese Checkers Table on Stand (Lot 203): With bronze mounted decoration and polychrome. [Dimensions: Height, 29 inches; diameter approximately 16 inches]
- xxx. Southeast Asian Gilt Metal Model of a Temple (Lot 210): With colored, beaded accents in a Plexiglass case. [Dimensions: 24 by 9 by 9 inches]
- xxxi. Marble Statue of a Renaissance Girl (Lot 194): With long braided hair, seated, holding a casket. [Dimensions: 63 1/4 by 31 1/4 by 16 inches]
- xxxii. Patinated Bronze Figural Group (Lot 57): Depicting four children and a dog walking across a log. With foliate protrusions of a rock form base. [Dimensions: 56 by 91 ½ by 55 inches]
- xxxiii. Pair of Patinated Metal Three-Figure Groups of Dance (Lot 25): Featuring, in each group, two drapery-covered children dancing with a putto releasing a bird on a shell-covered base. With illegible stamp on each base. [Dimensions: 63 by 36 by 36 inches]

- 1 xxxiv. Ramon Parmenter (American, B. 1954) (Lot 2): "Bubbles," bronze  
2 statue with colored patination of a little girl blowing bubbles. On a stone  
3 base. Signed and dated "@1993 Ramon Parmenter," numbered "24/30."  
4 [Dimensions: 45 by 16 by 23 inches]
- 5 xxxv. X. Raphanel (France, 20<sup>th</sup> Century) (Lot 641): Bronze statue of a sailor  
6 at the helm. [Dimensions: 25 by 11 ½ inches]
- 7 xxxvi. Pair of Malachite and Gilt Metal Nine Light Candel (Lot 634): With  
8 elongated urn form, featuring figural mounts with foliage and flowers and  
9 dolphin and shell bases. [Dimensions: Height, 62 inches]
- 10 xxxvii. Modern Bronze Statue of Cupid and Psyche (Lot 534): Signed on base  
11 "Pencil Debut." Dark brown patination. [Dimensions: 81 by 33 by 30  
12 inches]
- 13 xxxviii. Bronze Statue of a Peasant Boy (Lot 495): Holding a vineyard trellis.  
14 [Dimensions: Height, 48 inches]
- 15 xxxix. Bronze Statue of Crying Child (Lot 469): Holding a staff in one hand,  
16 with a snake wrapped around the other. Signed indistinctly on base.  
17 [Dimensions: 30 ½ by 36 inches]
- 18 xl. Pinocchio Model Puppet (Lot 1053): Custom Pinocchio fully articulated  
19 eight string puppet model standing forty inches. Housed in a plexiglass  
20 container. [Dimensions: 60 by 21 by 27 ½ inches]
- 21 xli. Monumental Ship Model (Lot 941): Large scale wooden model of a  
22 three mast tall ship with three deck stern and canvas sails. The entire boat  
23 and base are enclosed in a plexiglass cover. [Dimensions: 60 1/4 by 26 by  
24 75 inches]
- 25 xlii. Michael Jackson Batman Figure (Lot 805): Life-size replica of Batman  
26 and his complete molded rubber costume mounted to a base. The Batman  
27 suit is fitted over a life-size replica of the likeness of Michael Jackson.  
28 [Dimensions: 74 ½ by 33 by 20 inches]

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- xliii. **Captain Hook Statuette (Lot 1075)**: Molded resin statue of Captain Hook on faux wood base. [Dimensions: 27 ½ by 13 ½ by 9 ½ inches]
- xliv. **Replica 1909 Datable Model B Roadster (Lot 1005)**: Green, two-seater car, with crank-start combustion engine. Custom detailing on side panels displaying code of arms with monogrammed initials "MJJ." Plaque by steering wheel reads: "1909 Autocar/Custom Reproduction/Montclair California/ PA, Automotive" [Dimensions: 60 by 61 by 111 inches]
- xliv. **Michael Jackson NAACP Award (Lot 1320)**: Award from the 5<sup>th</sup> Annual NAACP Image Awards, 1972, for the "Recording Industry Male Vocal Group of The Year" [Dimensions: 11 ½ by 10 by 4 ½ inches]
- xlvi. **Michael Jackson Statuettes (Lot 1281)**: A group of three bronze sculptures by Danie De Jager (South African, 20<sup>th</sup> Century). One entitled "Barth Song" dated 1996, one of Michael Jackson dancing, dated 1996, and one of a figure between tree trunks, dated 1996. [Dimensions: Tallest, 14 by 10 ½ inches]
- xlvii. **Michael Jackson Wax Figure (Lot 1166)**: Life-size wax figure of Michael Jackson wearing a military style jacket and black pants, seated on a tall stool. The figure is housed in a plexiglass box on a black pedestal together with two license plates from Stadt Baden-Baden, Germany that read "BAD MJ 7" [Dimensions: 71 by 29 by 33 inches]
- xlviii. **Bronze Figural Group (Lot 284)**: Depicting three children on a bench, signed and dated "R. Tonti, 1930." [Dimensions: Height, 9 inches]
- xlix. **Reproduction Horse and Sulky Weathervane (Lot 259)**: Copper with applied green patination. Broken front leg. [Dimensions: 19 by 30 by 8 ½ inches]
- l. **Blair Muhlestein (American, 20<sup>th</sup> Century) (Lot 236)**: "Bunny Hug," bronze statue with colored patination depicting a girl holding stuffed animals on a rotating base. [Dimensions: Height, 22 inches]

- 1           li.     **Mixed Metal Figural Seven Light Candelabra (Lot 230)**: Featuring a  
2           cherub holding a flowering vine. [Dimensions: Height, 66 inches]  
3           lii.    **Copper Umbrella Stand (Lot 217)**: Umbrella shaped, with all over  
4           embossed design. [Dimensions: Height, 40 inches; diameter, 16 inches]  
5           liii. **Pair of Neoclassical Style Gilded Figural Tripod S (Lot 215)**: With  
6           decorative glass bowls. [Dimensions: Height, 35 inches; diameter, 14 ½  
7           inches]  
8           liv.   **Bronze Statue of Napoleon Crossing the Alps (Lot 158)**: Modern  
9           polychrome patinated version of Jacques-Louis David's famous painting,  
10          featuring Napoleon on rearing horse with billowing red cape and upraised  
11          arm, with cannon at his feet. Unsigned, mounted on green rectangular  
12          base. [Dimensions: 69 by 47 ½ by 20 ½ inches]  
13          lv.    **Silver Cupid Compote and Pair of Three Light Candelabra (Lot 150)**:  
14          Marked with a crowned C, a mark ORFE 30, and symbol marks.  
15          [Dimensions: Tallest height, 8 ¾ inches]  
16          lvi.   **Life-Size Bronze Figural Group of a Boy with a Dog (Lot 129)**: With  
17          variegated brown patination. Featuring a boy playing tug-of-war with a  
18          dog. [Dimensions: 64 by 52 inches]  
19          lvii. **Patinated Metal Statue of a Soccer Player (Lot 124)**: Variegated  
20          patinated statue featuring a young boy in a soccer uniform with his foot  
21          atop a soccer ball. On a marble base. Signed "Jim Davidson."  
22          [Dimensions: 42 by 21 inches]  
23          lviii. **Patinated Metal Statue of a Boy Throwing a Baseball (Lot 123)**: With  
24          variegated patination. Featuring a young boy in a pitcher's windup. On a  
25          marble base. Signed "Jim Davidson." [Dimensions: 40 by 22 inches]  
26          lix.   **Bronze Boy and Girl Mounted on a Wooden Base (Lot 119)**: Depicting  
27          a boy and a toy car being followed by a girl. Bronze with variegated  
28          patination. [Dimensions: 33 ½ by 19 by 35 inches]

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ix. **Patinated Metal Statue of a Baseball Player (Lot 117):** Variegated patinated bronze statue featuring a uniformed young boy in an "at bat" position. On a marble base. Signed "Jim Davidson." [Dimensions: 41 ½ by 24 inches]

lxi. **Patinated Metal Figural Group of a Young Girl and a (Lot 66):** Variegated patinated statue featuring a young girl standing in front of a brick wall with a teddy bear on top of it. Signed "Jim Davidson." [Dimensions: 32 by 27 by 19 inches]

lxii. **Life-Size Patinated Bronze Statue of a Marching Mus... (Lot 63):** Variegated patinated bronze statue featuring a boy in rags playing a makeshift hand chime. Signed "T. de Matteis." [Dimensions: 50 by 28 ½ inches]

lxiii. **Life-Size Patinated Bronze Statue of a Marching Mus... (Lot 62):** Variegated patinated statue featuring a boy in ill-fitting clothes playing a makeshift percussion instrument. Signed "T. de Matteis." [Dimensions: 48 by 19 by 27 inches]

lxiv. **Life-Size Bronze Statue of a Boy in Military Costume (Lot 61):** Variegated patinated bronze statue featuring a boy dressed up as an officer. Signed on base "T. de Matteis." [Dimensions: 45 by 36 inches]

lxv. **Life-Size Patinated Bronze Statue of a Marching Mus... (Lot 60):** Variegated patinated statue featuring a boy in a top hat playing two finger clappers. Signed "T. de Matteis." [Dimensions: 49 ½ by 33 ½ inches]

lxvi. **Life-Size Patinated Bronze Statue of a Marching Mus... (Lot 59):** Variegated patinated bronze statue featuring a caped and helmeted young boy playing the accordion. Signed on base "T. de Matteis." [Dimensions: 48 ½ by 28 ½ inches]

- 1                   lxvii. Patinated Metal Statue of a Girl with Chickens (Lot 11): Variegated  
2                   patinated statue featuring a girl observing chickens. Signed "Jim  
3                   Davidson." [Dimensions: 37 by 22 inches]
- 4                   lxviii. R. Aureli (Italian, 19<sup>th</sup> Century) (Lot 673): Bronze statue of Cupid  
5                   holding a bow and arrow. [Dimensions: 41 by 33 inches]
- 6                   lxix. Lorenzo Ghiglieri (American, B. 1931) (Lot 667): Born to Run, signed  
7                   "Lorenzo Ghiglieri" and dated "1986." [Dimensions: 11 by 26 by 10 inches]
- 8                   lxx. A. Bartelier (French 19<sup>th</sup>/20<sup>th</sup> Century) (Lot 504): Bronze tiger on a  
9                   marble base. Signed on base. [Dimensions: 14 by 30 by 8 inches]
- 10                  lxxi. X. Raphanel (France, 20<sup>th</sup> Century) (Lot 640): Bronze statue of a  
11                  woman in a peasant dress. [Dimensions: 25 by 9 ½ inches]
- 12                  lxxii. After Isidore Bonheur (French, 1827-1901) (Lot 536): Bronze  
13                  equestrian statue on marble stand. Signed on base. [Dimensions: 30 by 26  
14                  by 9 ½ inches]
- 15                  lxxiii. Mark Hopkins (American, 20<sup>th</sup> Century) (Lot 529): "Last One In,"  
16                  bronze sculpture of four children swimming, signed on base and numbered  
17                  695/2500 [Dimensions: Height, 13 ½ inches]
- 18                  lxxiv. Mark Hopkins (American, 20<sup>th</sup> Century) (Lot 528): A bronze statue of  
19                  children playing in a tree house, signed on base and numbered 58/2500.  
20                  [Dimensions: Height, 16 inches]
- 21                  lxxv. Sculptural Candelabra (Lot 502): Polychrome bronze featuring an angel  
22                  holding a nine light candelabra above a reclining man. Candelabra is loose.  
23                  [Dimensions: 94 by 30 by 37 inches]
- 24                  lxxvi. Blair Muhlestein (American, 20<sup>th</sup> Century) (Lot 499): "Out of the Best  
25                  Books," colored patinated bronze figure of a boy perched in a tree. Signed  
26                  and numbered 11/50. [Dimensions: 28 by 12 by 17 inches]
- 27                  lxxvii. Statue of Musketeer (Lot 466): In gilt metal on a marble footed base.  
28                  [Dimensions: 10 by 3 ¼ by 3 ¼ inches]