

**New York, New York  
April 16, 2013**

**TECHNICAL SUMMARY OF  
THE ART MARKET LEGAL TITLE RISK CHALLENGES  
FACING THE U.S. NONPROFIT MUSEUM COMMUNITY  
INCLUDING GENERAL MUSEUMS AND UNIVERSITY  
MUSEUMS**

## I. INTRODUCTION

If one looks at today's landscape surrounding the art market in general, the current approach used by museums in the United States to manage the art market ownership (legal title) risks is problematic and needs to evolve and to keep pace with current trends and developments.

The time is ripe for the museum community as a whole to reevaluate the issue of risk management for ownership of their collections of precious objects; it is not one museum's individual failings (nor the intention to point fingers at any museum in particular as having deficient standards) but rather the systemic approach to the issue that needs to be reevaluated and updated.

This summary is presented in the context of the United States museum community; however, the fundamental content is applicable to the international museum community as well.

## II. MARKET EVOLUTION

Consider the following key events of the last half a century and their impact on the collection management (namely, acquisition by gift or purchase and deaccession) process of the nonprofit museum sector:

- ❖ In the 1970s, The Metropolitan Museum of Art sold a number of works gifted by the donor Adelaide de Groot to raise money to purchase Velazquez's portrait of Jaun de Pareja for \$5.5 million; these deaccession sales were initially secret and when they became public led to a seven-month investigation by the New York Attorney General, which resulted in a settlement agreement still in effect today that requires the museum to notify the Attorney General of the museum's intention to sell any work in the museum's permanent collection worth more than \$5,000.<sup>1</sup>
- ❖ In the late 1980s, there was an important, widely attended international conference on the issue of restitution of Nazi-era stolen artwork and museums around the globe were asked to manage fairly restitution claims for artworks in their collection that were allegedly lost, looted or sold under duress during WWII and the Nazi-era.<sup>2</sup> Lawsuits quickly followed – for instance, the heirs of Jewish art dealer Paul Rosenberg successfully recovered Matisse's picture entitled "Odalisque" from the Seattle Art Museum in 1999 – and new restitution cases continue to be filed and litigated today; experts estimate that there are anywhere from hundreds of

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<sup>1</sup> Sue Chen, *Art Deaccessions and the Limits of Fiduciary Duty*, Duke Law Scholarship Repository (2009); Thomas Hoving, *The Chase, the Capture: Collecting at the Metropolitan* (Metro. Museum of Art ed., 1975); Thomas Hoving, *Making the Mummies Dance* (1993).

<sup>2</sup> Forty-four sovereign nations signed on to the "Washington Conference Principles on Nazi-Confiscated Art", which provides non-binding guidance in particular to art institutions to find swift, just and fair solutions to WWII restitution claims.

thousands to millions of artworks stolen during WWII still circulating in the market.<sup>3</sup>

- ❖ In the late 1990s, Italian and Swiss police discovered the warehouse of an Italian antiquities dealer trafficking in stolen antiquities. In 2005, Italy took the extraordinary step of indicting Marion True, a former antiquities curator of the J. Paul Getty Museum, for her role in the conspiracy surrounding looted antiquities. Since 2006, U.S. museums including the Museum of Fine Arts in Boston, the Getty Museum in Los Angeles and the Cleveland Museum of Art, have returned more than 100 antiquities (statues, bronzes, vases, mosaics and other objects), which were allegedly looted and illegally exported from source countries including Italy, Egypt, Turkey and Greece.<sup>4</sup>
- ❖ In early 2000, Sarbanes-Oxley (“SOX”) was enacted in response to several corporate scandals and collapses such as those involving Enron, Tyco International and WorldCom that cost investors billions of dollars, ushered in new standards of corporate governance and dramatically increased corporate directors’ personal liability. SOX has had spillover effects on the nonprofit sector, migrating best practice standards from publicly traded companies and their directors to nonprofit organizations and their trustees, and indirectly encouraged greater internal scrutiny of all governance tasks especially those activities fulfilling legal and fiduciary duties.<sup>5</sup>
- ❖ In 2005, Fisk University, a small historically African-American liberal arts school, tried to sell its \$74 million collection of early Modern artworks donated by the artist Georgia O’Keefe (with a gifting restriction barring any sales); the Georgia O’Keefe Foundation, Georgia O’Keefe Museum and Tennessee Attorney General opposed the sale; similar breaches of donor restricted gifts and bequests were at issue in litigation involving the Rose Museum at Brandeis University in Boston (2009-2011) and the Barnes Foundation in Merion and Philadelphia (2002-2012); three different state Attorneys General (Tennessee, Massachusetts and Pennsylvania) were involved in these cases.<sup>6</sup>
- ❖ In the wake of the 2008 financial crisis, many galleries went bankrupt; and the financial fraud of several bad-acting dealers came to light, most notoriously Lawrence Salander, former director of the once highly well-respected Salander-O’Reilly Galleries (“SORG”) was discovered to be

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<sup>3</sup> Maarit Hakkarainen and Tiina Kovulahti, *Research Into Art Looted By the Nazis – An Important International Task* (Nordisk Museologi 2007); Bloomberg, *Nazi Loot Recovery is Slow, Arbitrary, Claimants Groups Say* (June 24, 2009).

<sup>4</sup> The New York Times, Opinion, *The Great Giveback* (January 26, 2013).

<sup>5</sup> See generally, D. Brakman Reiser, *Enron.org: Why Sarbanes-Oxley Will Not Ensure Comprehensive Nonprofit Accountability*, 38 U.C. Davis L. Rev 205 (Nov. 2014); M. DeLucia, *Practical Guide to Major Changes Now Under Discussion in the Nonprofit Sector*, 46 N.H.B.J. 34 (Spring 2005); and P. Jackson, *Sarbanes-Oxley for Nonprofit Boards: A New Governance Paradigm*, John Wiley & Sons, Inc. (2006).

<sup>6</sup> After a lengthy, expensive legal battle, in August 2012 the Tennessee Supreme Court approved Fisk University’s plan to sell a 50 percent stake in its 101-piece art collection to the Crystal Bridges Museum in Bentonville, Arkansas.

fleeing his clients which included museums such as the Philadelphia Museum of Art (“PMA”). The PMA losses through the gallery’s fraud, breach of contract or conversion of two paintings, which SORG failed physically to return to the museum or to pay PMA the proceeds from the sale, were then claimed against PMA’s all risk art policy issued by AXA Art Insurance (“AXA”), a coverage issue never resolved by litigation and for potentially all property insurers because the PMA case against AXA was dismissed on procedural grounds; whether liability for losses of this nature will find different stakeholder-defendants in similar future cases remains an open question.<sup>7</sup>

- ❖ In 2009, the Rijksmuseum, the largest museum in the Netherlands, purchased Gerrit Adriaensz Berkheyde’s painting entitled “Golden Bend,” from the well-respected, wealthy collector and businessman Louis Reijtenbagh; unbeknownst to the museum, Reijtenbagh had reportedly previously pledged the same Old Master painting as loan collateral to two different international banks (ABN AMRO and JPMorgan Chase & Co).
- ❖ In 2011, the Gagosian Gallery, the world’s largest gallery, sold for \$2.5 million a Mark Tansey painting entitled “The Innocent Eye Test” which The Metropolitan Museum of Art partially owned (31 percent) and was promised full ownership by gift from the patron Jan Cowles. In related, ongoing litigation against the gallery and its principal, it has come to light that Larry Gagosian, undoubtedly like many other art dealers in the unregulated art industry, frequently represents both the seller and the buyer in the deal without disclosure and consent by either party, which presents an inherent conflict of interest considered illegal under New York’s and other states’ agency laws.<sup>8</sup>

### **III. COMPOUNDING TRENDS: SARBANES-OXLEY STANDARDS AND THE D&O INSURANCE MARKET**

These incidents (and other similar unmentioned events) have brought to the forefront of the public conscience a variety of financial, legal, reputational and moral issues surrounding museum acquisition and deaccession governance.

Many of these familiar, still occurring and still controversial issues often spur expensive, lengthy litigation and public discourse around such issues as (i) museum deaccession sales (e.g., what may be sold despite gift restrictions); (ii) WWII restitution claims (e.g., whether museums should rely on technical defenses); and (iii) source country patrimony claims (e.g., whether source country pre-1970 ownership laws should be accepted and trump UNESCO).

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<sup>7</sup> See *Philadelphia Museum of Art v. AXA Art Insurance Corp.*, 8:10-cv-00587-RWT (D. Md. March 8, 2010) (Order dated July 6, 2011, granted Defendant’s motion to dismiss complaint and denied as moot Plaintiff’s motion for partial summary judgment).

<sup>8</sup> The New York Times, *Gagosian Suit Offers Rare Look at Art Dealing* (November 7, 2012); Quest, *Who is on Your Side?* (March 2013).

Over the years, the museum community has responded to some of these acquisition-deaccession governance issues through industry-group or individual-museum initiatives – albeit with piecemeal solutions. For example, the American Alliance (formerly Association) of Museums (AAM) and the Association of Art Museum Directors (AAMD) early on encouraged higher due diligence standards for artworks that changed hands in continental Europe between 1932 and 1946 and to make provenance information about these objects accessible, such as by posting information about these objects noting any gaps in their provenance history during WWII on the Nazi-Era Provenance Internet Portal (<http://www.nepip.org/>), to the extent resources allow. More recently, these groups have advocated that member museums affirmatively publish their reasons for acquiring any archeological material and ancient art that lacks complete documented ownership history back to 1970.<sup>9</sup>

But only a handful of forward-thinking museums have actually addressed the full spectrum of art market title risks creeping into and affecting museum risk management decisions – from breach of donor gifting restrictions, unpaid consignment sales or purchased artworks with bank security liens to increased SOX-like trustee fiduciary standards – and the resulting financial and reputational losses and defense costs associated with defective title claims.<sup>10</sup>

In many instances, museum trustees – typically private-sector, ultra high net worth individuals and often business leaders and concerned about their personal liability and the growing scrutiny of the fulfillment of their financial and legal fiduciary duty obligations to the museum – are driving this change.<sup>11</sup>

Existing D&O insurance which museums and trustees routinely use to protect themselves against normal governance issues does not protect against the art market legal title risk. This is because (i) the D&O carrier excludes coverage related to claims for title (e.g., conversion, spoliation, transfer, disposal or challenge to ownership/title/provenance) or (ii) even if the museum’s D&O policy indirectly provides coverage for title-related losses, the D&O policy standard “Insured-versus-Insured” exception would likely apply and exclude coverage (when in-fighting dissenting trustees sue each other for indemnification or the museum and trustees are implicated in the same lawsuit).<sup>12</sup>

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<sup>9</sup> AAM, *Collections Stewardship, Standards Regarding the Unlawful Appropriation of Objects During the Nazi Era*, April 2001, <http://www.aam-us.org/resources/ethics-standards-and-best-practices/characteristics-of-excellence-for-u-s-museums/collections-stewardship>; AAMD, *Guidelines on the Acquisition of Archaeological Material and Ancient Art*, June 2008 revised January 2013; <http://www.aamd.org/newsroom/documents/PressReleaseAAMDGuidelinesRev.2013.pdf>. Notwithstanding these advances, the professional practice standards published by the AAM and AAMD generally acknowledge the limitations of the market’s ability (museum or private sector) to confirm ownership history and clear legal title.

<sup>10</sup> Museums remain increasingly concerned about protecting the assets of their institution – both economic and reputational ones.

<sup>11</sup> This perceived and potential actual personal liability exists despite U.S. federal (Volunteer Protection Act, 42 U.S.C. § 14502) and state laws – which provide immunity from civil liability for unpaid officers and trustees of nonprofit organizations – because these statutory protections have various, significant restrictions and exceptions which reflect a movement away from historically complete immunity and eliminate protection for a significant majority of claims and generally muddy the waters. *See, e.g.*, MASS. GEN. LAWS CH. 231 §85k (2012) (barring from protection torts committed by nonprofit trustees in the course of activities primarily commercial in nature even though carried out to obtain revenue for charitable purposes (such as museum purchase and deaccession sales)); D.C. CODE § 29-599.15 (2012) (requiring nonprofit organizations to have liability insurance to secure trustee immunity protection for liability to the extent the immunity is applicable); *see also* Nonprofit Risk Management Center, *State Liability Laws for Charitable Organizations and Volunteers* (2001), pp. 5-8 (listing numerous exceptions to U.S. state and federal nonprofit liability laws).

<sup>12</sup> D&O special exclusionary language for non-profit organizations ranges widely from absolute exclusions for title-related losses to, in limited instances, sublimit language for defense costs only combined with terms that implicitly require the insured to admit or accept a level of

In addition, because the legal title question will be front-and-center in any litigation involving a museum acquisition (by purchase or gift) or deaccession decision and the “fiduciary exception” applies to museum trustees,<sup>13</sup> the museum-sought legal opinion on the legal title risks will likely be discoverable and any such legal advice will be watered-down creating a lose-lose proposition for all involved.<sup>14</sup>

#### IV. OPTIONS TO MOVE FORWARD

Without a crystal ball, it is impossible to predict whether a singular seismic event will cause a paradigm shift in the museum title risk management process or whether it will be a matter of “the straw that breaks the camel’s back.” Either way, there is no going back to the traditionalist – fabled dwarf Rumpelstiltskin – view of the art market as a market free from serious ownership title risk exposure or loss, see <http://www.aristitle.com/news/index.php> for continuing public examples of the legal ownership issues impacting the global market and those listed at the end of this article specific to museums.

Given the above discussed past fifty-year constellation of museum-related title disputes – claims which are not dissipating but rather growing in depth and breadth – it is a question of when, not if, a museum has had or will have ownership claims in the future. Title risks are a foreseeable risk in museum collection management. Museums should consider the prospect that they will be deemed akin to negligent for not recognizing the coming sea-change driven by the mounting incidence of title challenges in the art market generally and against museums in particular and changing their risk management protocols.<sup>15</sup>

It is understandable that, before the existence of commercially reasonable and effective means to do so, museums did not shift their exposure to these risks to a third-party insurer.

However, now there are proactive, risk management tools readily available to eliminate the global market risk of defective legal title for museums and their trustees.

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culpability in order to trigger limited coverage and which in any case will be trumped by the Insured-Insured exclusion. With smaller institutions, exclusions may fall within general liability policies. Just as the art market property insurers have clarified in their commercial “all risk” policies and that they will not become *de facto* title insurers for conversion (see *Philadelphia Museum of Art v. AXA Art Insurance Corp.*, 8:10-cv-00587-RWT (D. Md. March 8, 2010) (dismissing case on procedural grounds without addressing whether conversion is a covered “all risk” loss; see footnote 7 and relevant text), as market title risks continue to impact the museum and broader nonprofit sectors, D&O insurers can be expected to continue to take similar defensive measures.

<sup>13</sup> In 2011, the U.S. Supreme Court in *United States v. Jicarilla Apache Nation*, -- U.S. ---, 131 S.Ct. 2313 (2011) affirmed the vitality in common law jurisprudence in the U.S. of the long-standing “fiduciary exception” to the attorney-client privilege. This means that when a fiduciary (such as a museum trustee) seeks to obtain legal advice on matters bearing on trust beneficiary interests (the general public is the beneficiary of a museum) such as the risk of loss of public or quasi-public art assets due to the art market legal title risks, this communication will be discoverable.

<sup>14</sup> See *id* (during oral argument Chief Justice Roberts asked questions suggesting that the prospect that advice might be discoverable under the fiduciary exception would deprive a trustee of candid legal advice and result in “bland, mushy, hedging advice”).

<sup>15</sup> In the seminal tort case of *Palsgraf v. Long Island R. Co.*, 248 N.Y. 229 (1928), Justice Cardozo found that the negligence of the train guards was a relational and not a proximate cause to the plaintiff’s injury. The *Palsgraf* precedent has been interpreted for generations to mean also that foreseeability is an aspect of proximate cause for negligence claims. See generally W. Jonathan Cardi, *The Hidden Legacy of Palsgraf: Modern Duty Law in Microcosm*, 91 B.U. L. Rev.1873 (2011).

Implementing new ownership best-practice measures today will not create undesirable precedent or necessitate review of a museum's entire collection, a seemingly daunting, not to mention expensive undertaking. Today's augmented ownership best practices can be adopted incrementally, beginning with new purchases, gifts by patrons, deaccessions and existing favored artworks anchoring the collection or at certain valuation thresholds.

## V. CONCLUSION

The museum industry's adoption of new ownership standards is analogous to manufacturers taking remedial measures in the product liability context where such subsequent changes would have made an earlier harm or injury less likely to occur and are inadmissible to prove negligence, culpable conduct or defect in product or design.<sup>16</sup>

*"Because the world gets wiser as it gets older [it does not mean] therefore it was foolish before."*<sup>17</sup> Nor, however, may or should a party turn a blind eye to change.

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*[Postscript: ARIS Title Insurance Corporation, headquartered in New York, New York, is a member of the international insurance group, Argo Group (NASDAQ: AGII). As the recognized world authority on legal title risks impacting the global art and collectibles market, ARIS stands ready to work with the museum community – management and trustees alike – to develop proactive, fiscally-manageable, forward-moving strategies to begin to address the art market legal title risks more effectively. [www.aristitle.com](http://www.aristitle.com).]*

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<sup>16</sup> See generally Fed. R. Evid. 407 (Notes of Advisory Committee on Proposed Rules in 1995, 1997 and 2011).

<sup>17</sup> See *id*; *Hart v. Lancashire & Yorkshire Ry. Co.*, 21 L.T.R.N.S. 261, 263 (1869) (quoting Baron Bramwell).

**Art Market Title Risk – Museum Specific  
Partial Listing of Public Information**

March 4, 2013	<i>Tacoma museum auctions donated Chinese artifacts</i>
February 28, 2013	<i>Battle over disputed folk art museum gifts may end soon, but asset war rages on</i>
January 25, 2013	<i>Kravis claims collector Bryant reneged on joint MoMA gift</i>
January 7, 2013	<i>Brooklyn Museum may have to pay hundreds of thousands to store fake art</i>
December 13, 2012	<i>Coast Guard sues to get back lighthouse lens</i>
December 9, 2012	<i>Row erupts over British empire museum's 'lost' artefacts</i>
November 20, 2012	<i>Hopper expert questions how minister got an art trove</i>
September 27, 2012	<i>Flea-market Renoir allegedly stolen from Baltimore museum; auction cancelled</i>
July 21, 2012	<i>An artifact, or a payday</i>
July 9, 2012	<i>Special report museum insurance. Sticking point. The varied nature of insurance for museums</i>
June 1, 2012	<i>Nazi victim's family told to return artifact</i>
March 15, 2012	<i>The \$10 million Degas ballerina, heiress Huguette Clark and the tax man</i>
January 24, 2012	<i>Thanks a lot, Uncle Sam</i>
November 17, 2011	<i>Wedgewood museum faces threat of forced sale</i>
November 8, 2011	<i>200 years later, France claims a missing artwork</i>
November 4, 2011	<i>The Getty Museum is in a legal fight over Armenian bible pages</i>
October 19, 2011	<i>Museum lays claim to Dr. Kevorkian's art</i>
October 15, 2011	<i>Grossman: Judge might be asked to determine painting ownership</i>
October 11, 2011	<i>Museum welcomes dispute over work</i>
October 6, 2011	<i>Widow and ex-wife battle over collector's icons</i>
September 9, 2011	<i>Mary Brogan Museum of Art &amp; Science borrowed Italian painting: ownership dispute</i>
August 23, 2011	<i>Family's claim against MoMA hinges on dates</i>
August 3, 2011	<i>New York socialite jailed for allegedly stealing millions of dollars worth of historical documents</i>
June 30, 2011	<i>Germany hands Netherlands 8 Old Masters bought in World War II</i>
June 15, 2011	<i>Bad Blood: Czech government scrambles to recall international art loans, fearing they will be seized in \$500 million dispute</i>
June 8, 2011	<i>Michael Werner Gallery sues trustee accused of hoarding painting</i>
June 6, 2011	<i>'Innocent buyer' of stolen art loses out to French museum</i>
May 24, 2011	<i>An Italian painting in Kentucky, headed home</i>
May 11, 2011	<i>Met seeks return of 'Innocent Eye Test'</i>
May 4, 2011	<i>SJM ex-director under scanner over artefacts 'theft'</i>
April 22, 2011	<i>An Austrian and Nazi victim's heir to get Klimt painting from Salzburg's modern art museum</i>
April 6, 2011	<i>Armenian restitution claims grow</i>
March 30, 2011	<i>Clyfford Still Museum circumvents donor intent</i>
March 15, 2011	<i>Dallas museum is sued</i>
March 11, 2011	<i>Collector sues Gagosian Gallery for selling him a painting partially owned by Met</i>
February 16, 2011	<i>After two decades of secrecy, a German museum can finally unveil its mystery Monet</i>
December 9, 2010	<i>Metropolitan museum sued for a Cezanne</i>
November 3, 2010	<i>Stolen Degas painting resurfaces at Sotheby's auction</i>
October 18, 2010	<i>Chelsea Art Museum could close</i>
October 14, 2010	<i>Museum of Fine Arts v. Seger-Thomschitz, Museum of Fine Arts, Boston, Appellee v. Claudia Seger-Thomschitz, Defendant, Appellant</i>
October 4, 2010	<i>Norton Simon's disputed 'Adam and Eve' getting closer look from Supreme Court</i>
August 18, 2010	<i>Fight to save Wedgewood collection from company pension scheme</i>
July 28, 2010	<i>Hungary sued in Holocaust claim</i>
July 20, 2010	<i>Leopold Museum to pay \$19 million for painting seized by Nazis</i>
May 21, 2010	<i>Say it isn't Picasso - Paris art theft raises security and title concerns</i>
March 11, 2010	<i>Museum sues insurer in Salander fiasco</i>
March 5, 2010	<i>Ansel Adams' son sues museum for prints</i>
February 11, 2010	<i>Judge in Italy orders return of Getty Bronze</i>
January 6, 2010	<i>Art thieves grab \$1.15 million Degas as heists spread</i>
December 9, 2009	<i>Family feud imperils a prized Spanish art collection</i>
December 7, 2009	<i>The art of the trade</i>
November 13, 2009	<i>UK museums can return looted art</i>
October 22, 2009	<i>Nazi looted paintings discovered at Southern Methodist University, future home of the George W. Bush Presidential Library</i>

October 22, 2009 *Creditors seize Dutch museum's art collection*  
 October 7, 2009 *Dispute over Schiele painting heads to trial*  
 October 5, 2009 *US Department of State investigates Museo del Prado*  
 August 26, 2009 *Glaser heirs reject UK spoliation ruling*  
 August 19, 2009 *Appeals court overturns Holocaust looted-art law, but Norton Simon suit continues*  
 July 15, 2009 *Court removes an obstacle for Fisk University in struggle over Stieglitz art sale*  
 July 10, 2009 *Red faces in Paris as 'destroyed' Cartier-Bresson snaps resurface*  
 June 18, 2009 *Debbie Reynolds' Hollywood museum enters Chapter 11*  
 June 4, 2009 *Huge bequest by literary agent*  
 May 30, 2009 *Massachusetts judge rules in favor of Museum of Fine Arts, Boston regarding Kokoschka work*  
 May 22, 2009 *National Gallery settles suit over Soutine painting*  
 May 21, 2009 *Esmerian property removed from American Folk Art Museum*  
 April 22, 2009 *De Young selling tribal art as family squabbles*  
 April 22, 2009 *Dutch bank challenges JPMorgan, Rijksmuseum over masterpiece*  
 April 17, 2009 *JPMorgan Chase claims rights to Rijksmuseum-owned painting*  
 April 13, 2009 *MoMA sued over German works*  
 March 24, 2009 *Yale sues to retain ownership of Van Gogh painting*  
 March 24, 2009 *Museum sued for return of rare stone tablet*  
 January 27, 2009 *Brandeis to close art museum, sell Warhol as endowment slips*  
 October 30, 2008 *Minneapolis Institute restitutes Leger painting*  
 September 23, 2008 *De Young Art Collection embroiled in family feud*  
 September 3, 2008 *Sotheby's sues CNET founder for \$16.8 million in fees*  
 April 21, 2008 *Put a diamond under stress, and you might crack*  
 April 5, 2008 *Museum arranges to return stolen art to Italy*  
 April 2, 2008 *Art museums struggle with provenance issues*  
 March 21, 2008 *Mortgage crisis hits cultural institutions*  
 March 7, 2008 *Museum wants stolen Pissarro returned*  
 March 4, 2008 *'Peaceable Kingdom' painting by Edward Hicks leaves American Folk Art Museum*  
 February 25, 2008 *Show it or sell it: Museums are urged to put unseen artefacts on the market*  
 January 24, 2008 *Fed agents raid California museums for looted artifacts*  
 January 24, 2008 *MFA sues to bolster claim to disputed 1913 painting*  
 December 7, 2007 *Museums ask New York federal court to reject claim on Picassos*