

# **Exhibit 14**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DONALD GRAHAM,

Plaintiff,

V.

Case No.

1:15-cv-10160-SHS

RICHARD PRINCE, GAGOSIAN GALLERY  
INC. and LAWRENCE GAGOSIAN,  
Defendants.

-----x

ERIC McNATT

Plaintiff

V.

Case No.

1:15-cv-28896-SHS

RICHARD PRINCE, GAGOSIAN GALLERY  
INC. and LAWRENCE GAGOSIAN  
Defendants.

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10:00 a.m.  
March 23, 2018  
825 Eighth Avenue  
New York, New York

\* CONFIDENTIAL \*

VIDEOTAPED DEPOSITION of RICHARD PRINCE, a Defendant in the above entitled matter, pursuant to Notice, before Stephen J. Moore, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public of the State of New York.

1 RICHARD PRINCE

2 involved, in the making of *The Nurses*, there  
3 was a lot of nonfiction involved.

4 Again, removing some of the  
5 speculation that accompanies most artwork.

6 Most artists ask questions. I  
7 try to answer questions.

8 I -- and I believe that *The*  
9 *Nurses* were in some ways very playful, and I  
10 had a lot of fun painting them. They were a  
11 real joy to paint. The colors -- and I kept  
12 the title.

13 I was -- and I was also  
14 interested in the fact that there were  
15 essentially -- I was kind of, I didn't know it  
16 at the time, but there were millions, not  
17 millions -- perhaps not millions, that's an  
18 exaggeration, there were thousands of *Nurse*  
19 paperbacks.

20 And I'm a bibliophile, everybody  
21 knows that I collect books. And this was in my  
22 wheelhouse, this was part of what -- a lot of  
23 my work is about collecting and -- so, the  
24 whole experience of going into a book store  
25 changed.

1 RICHARD PRINCE

2 MR. BALLON: Objection.

3 A I would say I don't know,  
4 because I don't know if rastajay92 posted a  
5 photograph.

6 I would have no knowledge of  
7 that.

8 Q So, in creating the work  
9 depicted in Exhibit 5, you found rastajay92's  
10 post on Instagram, right?

11 A Yes.

12 Q And then you made a comment on  
13 rastajay's post on Instagram, correct?

14 A Yes.

15 Q And then you took a screen shot  
16 of rastajay92's post and his comment and your  
17 comment on your iPhone, correct?

18 MR. BALLON: Objection,  
19 foundation. You can answer.

20 A Yes.

21 Q And then you had that screen  
22 shot of rastajay92's post printed on canvas?

23 MR. BALLON: Objection, printed.

24 MS. APPLETON: Objection to form.

25 MR. BALLON: You can answer.

1 RICHARD PRINCE

2 A I had it Inkjetted on canvas.

3 Q So you had the screen shot of  
4 rastajay's 92 Instagram post Inkjetted on  
5 canvas, right?

6 A Yes.

7 Q Did you think at the time that  
8 the photo was taken by rastajay92?

9 MS. APPLETON: Objection to form.

10 A Again, I didn't -- I wasn't  
11 assuming, or I didn't assume that it was a  
12 photograph.

13 I had no -- I didn't have the  
14 ability or the knowledge that what rastajay was  
15 posting on his Instagram feed was a photograph.

16 So I would have to answer that  
17 question no.

18 Q Did you understand that what  
19 rastajay might be posting on his Instagram feed  
20 was a digital copy of a photograph?

21 MR. BALLON: Objection, improper  
22 hypothetical.

23 A I can't answer that.

24 Q Do you recognize Instagram as a  
25 place where people post photographs?

1 RICHARD PRINCE

2 original photo in the rastajay92 post?

3 A Yes.

4 Q Who took that photo?

5 MR. BALLON: Objection with  
6 respect to original photo.

7 Slow down enough to let me put my  
8 objections on the record before you  
9 answer.

10 MR. MUNN: Withdrawn.

11 Q So, looking at the Exhibit 5,  
12 was the layout of the work in Exhibit 5  
13 dictated by the standard graphic interface of  
14 Instagram?

15 MR. BALLON: Objection, lacks  
16 foundation.

17 You can answer if you know.

18 A In 2014 this was -- I believe  
19 this was the way Instagram -- this was one of  
20 the ways in which you could post an Instagram  
21 image.

22 Q Did you alter the Instagram  
23 layout after screensaving it?

24 MR. BALLON: Objection with  
25 respect to Instagram layout.

1 RICHARD PRINCE

2 A Yes.

3 Q How did you alter the Instagram  
4 layout after screensaving it?

5 A I -- it took a while. I thought  
6 about a great -- I spent a great deal of time  
7 considering the presentation.

8 The generation of artists that I  
9 grew up with, a primary consideration was  
10 presentation of images.

11 It was very important about how  
12 you produced, how you processed, how you  
13 recontextualized, how you framed or perhaps you  
14 didn't frame. Did you use glass? Did you use  
15 plexiglass?

16 A lot of thinking went into the  
17 production.

18 In 2014 I was working with a  
19 particular lab that had at the time the most  
20 advanced Inkjet machine in the United States.

21 They had -- I experimented with  
22 many surfaces that they had available, all of  
23 which I rejected.

24 This process went on for some  
25 time. I went -- I remember going down, and one

1 RICHARD PRINCE

2 of their employees said we just got in this new  
3 canvas, and I -- and they showed me  
4 reproduction, and I got very excited.

5 The new canvas was brand new, it  
6 was a canvas that received the jet, meaning the  
7 process, in a brand new way.

8 It fused the coating of the  
9 image that, in a way, since I was using my  
10 phone at the time as my new paint brush, in a  
11 way that was very satisfying, the way the  
12 ink -- it didn't sit up on the canvas, it  
13 didn't sit inside the canvas, it just hovered  
14 in such a way that I had never seen the process  
15 of Inkjet conduct itself.

16 And it was at that time that I  
17 decided that this new type of canvas, this was  
18 the most important part of creating the New  
19 Portraits.

20 This is what would transform my  
21 screen shots, my painting with the telephone,  
22 which, again, it's not a telephone. My  
23 telephone isn't a telephone, it's a camera.

24 And I didn't even at the time  
25 know what a screen shot was.



1 RICHARD PRINCE

2 how I wanted to translate what I found on  
3 Instagram.

4 Q So, you altered the layout of  
5 the Instagram post buying jet printing it to  
6 canvas, is that correct?

7 MR. BALLON: Objection,  
8 mischaracterizes the witness' testimony.

9 You can answer.

10 A It was one way I transformed the  
11 image, yes.

12 Q Was the 3W in the upper  
13 right-hand corner of the image added by you?

14 A No.

15 Q Was rastajay92's handle added by  
16 you?

17 A No.

18 Q Was rastajay92's profile picture  
19 added by you?

20 MR. BALLON: Objection, lacks  
21 foundation, profile picture. You can  
22 answer.

23 A No.

24 Q In the photo that takes up --

25 A Can I just interrupt you for a

1 RICHARD PRINCE

2 Q And rastajay92's comment was  
3 already there, correct?

4 A Yes.

5 Q And rastajay92 commented "Real  
6 bongo Nyah man a real Congo Nyah," with an  
7 emoticon of a fist.

8 Do you see that?

9 A Yes.

10 Q Did you know what that meant at  
11 the time?

12 A I wasn't really -- those were  
13 called emojis, and I believe that they were a  
14 new way -- I think Instagram had just added a  
15 few, a few emojis for some reason.

16 I don't know why, but they added  
17 them, which you could add to your comment.

18 Q Did you know what rastajay92  
19 meant by "Real bongo Nyah man a real Congo  
20 Nyah"?

21 A I made -- I made the assumption  
22 that he knew about inside information.

23 Q What do you mean by that?

24 A He knew about Lord Buckley.

25 Q He knew about Lord Buckley.

1 RICHARD PRINCE

2 What does that mean?

3 A Lord Buckley was one of the  
4 first rappers, 1953 he published a book called  
5 The Nazz, where he used language like real  
6 bongo Nyah man a real Congo Nyah.

7 He was one of the first pioneers  
8 to use a type of rap -- a type of almost what  
9 is now referred to as forensic linguistics.

10 And in a strange way, when I  
11 read rastajay's 92, I felt -- I felt  
12 communication, I felt that we had something in  
13 common.

14 Q Are you familiar with the music  
15 of Stephen Marley?

16 A Stephen Marley, no.

17 Q Are you familiar with the  
18 Jamaican patois, also known as Jamaican Creole?

19 A No.

20 Q Now, do you agree that the image  
21 of the Rastafarian in Exhibit 5 is the dominant  
22 image in this work?

23 MR. BALLON: Objection.

24 A No.

25 Q So your testimony today is that

1 RICHARD PRINCE

2 default font for Instagram comments?

3 MR. BALLON: Objection, lacks  
4 foundation.

5 A I don't understand the question.

6 Q Did you just type it into  
7 Instagram and post it, or did you change the  
8 font that it was displayed?

9 MR. BALLON: Objection.

10 A I -- I still don't understand  
11 the question.

12 Q Are you aware of any options on  
13 Instagram to change the default font that your  
14 comments appear in?

15 MR. BALLON: Objection.

16 A I don't believe that I know of  
17 that process on Instagram.

18 Q And is the raised fist emoji  
19 from a standard set of emojis that are  
20 available for posting on Instagram?

21 MR. BALLON: Objection to  
22 standard and available.

23 Q You can answer.

24 A Yes.

25 Q So, how did you add your comment

1 RICHARD PRINCE

2 to rastajay92's post; simply typed it in and  
3 pressed enter, correct?

4 A It wasn't that simple.

5 Q So you took some time to think  
6 about the words to add to the post first?

7 A I did a -- the words, the  
8 comment, which is the most important part of  
9 the portrait, the thing I became aware about  
10 Instagram immediately was the comments.

11 It wasn't the images that people  
12 were posting of themselves.

13 I was really interested in the  
14 language, the amount of likes, and I was also  
15 really aware and interested in the comment that  
16 that the rastajay made.

17 So I wanted to make a comment, I  
18 wanted to make a comment, because that was my  
19 contribution.

20 I thought about what -- what  
21 could I change, what could I add, how could I  
22 transform something that had already been out  
23 there and make it unique.

24 Make it different, make a parody  
25 of rastajay's portrait.

1 RICHARD PRINCE

2 And as I got more and more into  
3 Instagram, I realized it was the comments, and  
4 what happened was there were many comments, as  
5 I recall there might have been 50 comments the  
6 day that I screensaved rastajay's portrait of  
7 himself.

8 However, there was a problem;  
9 how do I get my comment in the screensave?

10 I wouldn't describe myself as a  
11 computer geek, however I figured out how to get  
12 rid of the 50 comments that were under  
13 rastajay92's comments and get my comment next  
14 to his.

15 And I figured that out on my  
16 own.

17 That, once I figured that out,  
18 as I -- as I said, as I say in my comment, I  
19 really started to jam. I really couldn't  
20 believe that I figured it out.

21 And it's actually, it was very  
22 simple.

23 But at the time, you know, there  
24 were a lot of concerns of what do I do, how do  
25 I change it, what are my interests, and am I

1 RICHARD PRINCE

2 person's feed, Jessica Hart.

3 And I was on the phone with her,  
4 and I was saying to her, Jessica, I'm looking  
5 at your Instagram feed, there is this one image  
6 of you that's absolutely fantastic, you know,  
7 someone should make a portrait of it.

8 And she said to me, why don't  
9 you?

10 So, I said to her, well, I'll  
11 try. And when I say I tried, it took a while,  
12 and all the things that I have explained to you  
13 now, it took a while.

14 You know, I have to dot my i's  
15 and cross my t's before I sign off on it.

16 And I think what the difference  
17 between the '84 portraits and the Instagram  
18 portraits was the language. The language adds  
19 so much.

20 I'm not really -- I'm not really  
21 paying much attention to the actual -- I wasn't  
22 really -- I just -- you know, rastajay92 had  
23 many images of Rastafarians.

24 I -- you know, it's -- all I can  
25 say it's instinctual.

1 RICHARD PRINCE

2 I have been doing this since I  
3 can remember, and I have a very good instinct.

4 And I thought this was a  
5 representation, this was a pretty good  
6 representation, and I simply thought this is a  
7 portrait of rastajay92, and I also knew at the  
8 time that rastajay92 was a probably a  
9 pseudonym.

10 Like the joke I use, you know, I  
11 never had a penny to my name, so I changed my  
12 name.

13 And I think a lot of the  
14 comments were like jokes for me. It's  
15 language, it adds to the narrative, it adds  
16 another layer.

17 And it's extremely important to  
18 separate these portraits from the portraits I  
19 did in 1984 and 1985, because those portraits  
20 in the end were not successful.

21 No one paid any attention to  
22 them, no one bought them, and to tell you the  
23 truth, to this day there is not that many  
24 people who know about them.

25 So, again, this is -- the



1 RICHARD PRINCE

2 you added to the work depicted in Exhibit 5 was  
3 selecting the Inkjet printing process to  
4 canvas, and adding your comment before  
5 screensaving the Instagram post, correct?

6 MR. BALLON: Objection to two  
7 contributions, mischaracterizes the  
8 witness' prior testimony.

9 Q You can answer.

10 A You will have to ask the  
11 question again, I'm sorry.

12 Q Besides the comment that you  
13 added before screensaving rastajay92's post and  
14 Inkjet printing it to canvas, what other  
15 changes did you make?

16 MR. BALLON: Objection,  
17 mischaracterizes the witness' prior  
18 testimony.

19 MS. APPLETON: Objection to form.

20 Q You can answer.

21 A Scale, width. And the plan that  
22 this portrait was going to be part of a novel,  
23 so to speak, part of additional portraits that  
24 would, when in fact eventually exhibited, it  
25 would become a democracy, it would become an

1 RICHARD PRINCE

2 for \$100.

3 One was bought, just one.

4 And it's interesting, that the  
5 dealer bought that Soup Can back from the  
6 collector, because he realized that in the end  
7 it was the entire body of Soup Cans that was  
8 important.

9 And now, that entire body of  
10 work is at Museum of Modern Art, next to one of  
11 my Joke paintings.

12 Q Now, you said that the comment  
13 Canal Zinian da lam jam, or de lam jam was  
14 autobiographical and self-referential.

15 What did you mean by that?

16 A Well, I think it's common  
17 knowledge in the art world amongst my friends,  
18 and again, I'm only speaking -- my audience  
19 consists of maybe 9 people, 6 people, 13  
20 people, 21 people.

21 Sometimes it consists of 3  
22 people. Sometimes it only consists of myself.  
23 It's a kind of joke, a one-liner, Canal Zone.

24 Everybody knows that I was born  
25 in the Canal Zone, everybody knows that -- that

1 RICHARD PRINCE

2 wasn't born in the Canal Zone? Where is the  
3 Canal Zone? What is the Canal Zone?

4 I use that to my -- I use that  
5 reference, I use that autobiographical  
6 situation -- I was born in a zone, and I  
7 believe that in the end it adds to my  
8 difference.

9 Q Is Canal Zinian de lam jam an  
10 example of Bird Talk?

11 A Yes.

12 Q Is it fair to say that Canal  
13 Zinian de lam jam is gobbledygook?

14 MR. BALLON: Objection,  
15 gobbledygook?

16 A Yes.

17 Q Now, did you personally have  
18 the -- Inkjet the work in Exhibit 5?

19 MR. BALLON: Objection,  
20 personally.

21 You can answer.

22 MR. MUNN: Let me rephrase?

23 Q Did you send the work in Exhibit  
24 5 to be Inkjet printed on canvas?

25 A Absolutely.

1 RICHARD PRINCE

2 Q Did you post the tweet displayed  
3 in Exhibit 8 on or around January 6, 2016?

4 A Sorry, I'm looking for that  
5 information.

6 Q If you look at the bottom --

7 A The bottom?

8 Yes.

9 Q And.  
10 You comment, "Booze pot sex. I  
11 guess I was wrong. Memo to Turner: I did not  
12 make -- sorry, "I DID NOT take make create this  
13 montage."

14 Do you see that?

15 A Yes.

16 Q What did you mean by that?

17 A The images in the tweet, I did  
18 not make it; I did not create it.

19 Q Where did the image in the tweet  
20 come from?

21 A I don't know.

22 Q But you posted the image in the  
23 tweet to Twitter?

24 A I was making a comment on the  
25 fact that I didn't make that montage.

1 RICHARD PRINCE

2 Q But you did post the montage to  
3 Twitter on January 6, 2016, correct?

4 MR. BALLON: Objection, lacks  
5 foundation.

6 A I posted a montage that I did  
7 not make so that I could comment on it that I  
8 did not make it on Twitter.

9 Q And where did you find it to  
10 post it to Twitter?

11 A I have no idea.

12 Q At the time you made the tweet  
13 that's in Exhibit 8, you were aware that  
14 Mr. Graham contested your use of his photograph  
15 as copyright infringement, right?

16 A Yes.

17 Q And in the montage you posted,  
18 the image on the right is the Rastafarian that  
19 was used in the rastajay92 post, correct?

20 MR. BALLON: Objection, lacks  
21 foundation.

22 A It has similarity to the  
23 rastajay portrait.

24 Q You can put that to the side for  
25 now.

1 RICHARD PRINCE

2 A Yes.

3 MR. BALLON: Objection.

4 Q How did you do it, by screen  
5 shot?

6 A Yes.

7 Q When you made the Instagram post  
8 of Kim Gordon's picture, how did you take the  
9 screen shot, on your phone?

10 A Yes.

11 Q Where did you take the screen  
12 shot?

13 A On my phone.

14 Q Were you in your studio in New  
15 York when you took that screen shot?

16 A I was post-place.

17 Q Is post-place in your studio in  
18 New York?

19 A Post-place can be anywhere, any  
20 time, under any circumstances. That's how I  
21 describe the process.

22 I can't recall the specific  
23 physicality, location or the whereabouts of  
24 when I make -- when I choose, when I make a  
25 decision to screensave.

1 RICHARD PRINCE

2 trying to take her portrait, they had changed  
3 the amount of room, the amount of comments you  
4 could make, and I believe they also provided  
5 more emojis at the time.

6 So it actually gave me more  
7 flexibility.

8 And if I remember correctly, I  
9 made this portrait over the -- I was thinking  
10 about, with Kim, to make more than one portrait  
11 of her, which was something that I was really  
12 seriously considering since, the fact that she  
13 was an old friend.

14 I thought I had recalled that  
15 Warhol had made a portrait of a friend of mine  
16 or -- no, actually she wasn't really a friend  
17 of mine, but I recall her.

18 Warhol had made a portrait of  
19 Debbie Harry, and he had made several different  
20 portraits that were very similar looking.

21 So the idea occurred to me to  
22 perhaps borrow that idea of how Warhol  
23 approached his subject with someone like Kim,  
24 since I knew her very well.

25 Q After you made the Instagram

1 RICHARD PRINCE

2 post, posting the Kim Gordon photo and your  
3 comments, you took a screen shot, then sent it  
4 to a printer to have it Inkjet printed on  
5 canvas, right?

6 MR. BALLON: Objection.

7 A After I made my final decision I  
8 made a screen shot, I sent it to my studio, and  
9 as I remember, we made a proof in the studio,  
10 and I sat with the proof for a number of days.

11 And I think at the time I was  
12 becoming more familiar with the technology, and  
13 I believe I -- the vocabulary that I would use  
14 at this point, is I would -- if I approved of  
15 the proof, I would send a file to the lab that  
16 I was working with to produce the portrait of  
17 Kim Gordon canvas.

18 So it was no longer -- I was  
19 becoming more familiar with the technology, the  
20 coding ability, and also the -- the ability to  
21 manipulate, change the way the portrait was  
22 translated and recontextualize on the canvas  
23 itself.

24 As I said, Inkjet keeps  
25 changing, keeps improving week by week, day by



1 RICHARD PRINCE

2 day, month by month.

3 And they also are always  
4 introducing new surfaces, new types of canvas.  
5 You're always -- you can go there and select  
6 all kinds of surfaces on which to print from.

7 And this is a -- this type of  
8 situation to be presented with, it just comes  
9 down to aesthetics.

10 And I made -- I made these types  
11 of aesthetic decisions based on what I wanted  
12 ultimately the portrait to look like.

13 MR. MUNN: Let's take a short  
14 break off the record and we will come  
15 back, okay?

16 THE VIDEOGRAPHER: One moment,  
17 please. Watch your microphones. Here  
18 now marks the end of video file number  
19 4. The time is 3:54 p.m.

20 We are now off the record.

21 (At this point in the proceedings  
22 there was a recess, after which the  
23 deposition continued as follows:)

24 THE VIDEOGRAPHER: Here now marks  
25 the beginning of video file number 5.

1 RICHARD PRINCE

2 The time is 4:06 p.m. Back on the  
3 record.

4 Q Let's go back to the New  
5 Portrait that depicted rastajay92's Instagram  
6 post for a moment, okay?

7 Now, you testified earlier that  
8 you had done some computer magic to remove some  
9 comments that were below the post.

10 Do you recall that?

11 A Yes.

12 Q Do you sitting here today  
13 remember how many comments were on the  
14 rastajay92 post at the time that you made your  
15 comment?

16 MR. BALLON: Asked and answered.

17 A Ballpark, 50 comments.

18 Q And you didn't actually delete  
19 those comments, you just reported them as spam,  
20 and so that they would be hidden for the screen  
21 shot that you took of your comment?

22 A At the time I didn't realize  
23 what I was doing. At the time I didn't realize  
24 they were spam, I didn't know what spam was.

25 And I don't recall how I came

1 RICHARD PRINCE

2 upon the actual physical action that I was --  
3 how I manipulated my phone to -- the idea of  
4 swiping away other people's comments.

5 However I do remember it was  
6 important to read all the comments, whether it  
7 was 50 comments, sometimes there would be 200  
8 comments.

9 And the reason why I say this is  
10 because all the comments were important,  
11 because after I figured out I could keep three  
12 comments below rastajay's portrait, I would  
13 have to figure out what comments did I want to  
14 keep.

15 Were there any interesting types  
16 of comments? Was there any interesting types  
17 of language? Did I want to comment on  
18 someone's comment?

19 And this is why the comments  
20 became such an integral part of making the  
21 portrait, and this is why it took sometimes  
22 three hours, sometimes it took three days to  
23 make a portrait.

24 And it was interesting, when you  
25 read 50 comments, is I found that I got to

1 RICHARD PRINCE

2 But you didn't, I did.

3 Q Now, looking at your Kim Gordon  
4 work in Exhibit 60, were you commenting in this  
5 work on the photograph of Kim Gordon that you  
6 posted in Instagram?

7 A No.

8 Q Were you criticizing the  
9 composition of the photograph of Kim Gordon  
10 that you posted in Instagram?

11 MR. BALLON: Objection to form.

12 A In some ways I was commenting on  
13 the social media, the whole idea of putting up  
14 images on a new platform that was available to  
15 anyone, to an entire population.

16 Instagram was -- it seemed at  
17 the time, even though I was late to Instagram,  
18 everybody I knew was on Instagram.

19 And I think a lot of the  
20 comments or some of the comments were simply I  
21 was commenting on the idea of social media.

22 Q So, your work, Portrait of Kim  
23 Gordon, is a commentary on social media, is  
24 that right?

25 A I think to some extent it is,

1 RICHARD PRINCE

2 copyright very plainly with, I believe it's the  
3 C with the circle, which I really don't -- I'm  
4 not a lawyer, I'm an artist, but I do -- I did  
5 begin at some point in my career to understand  
6 what that meant.

7 And now I do -- I am aware of --  
8 excuse me, watermarking an image.

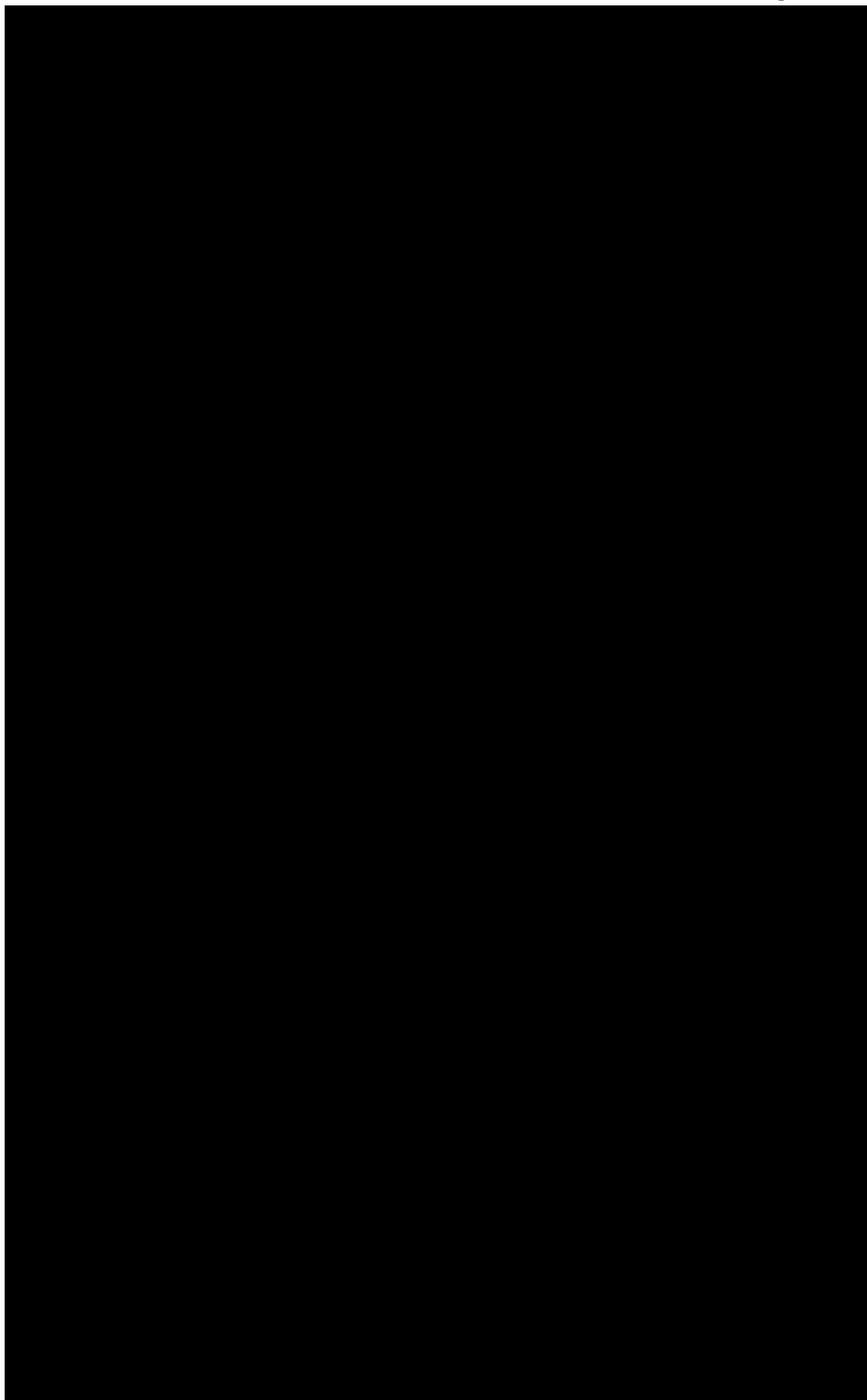
9 And I think if I see images that  
10 have that C with the circle, or watermark, I  
11 respect -- that's a telegraph to me and I --  
12 and if an artist editorializes that type of  
13 signature onto their work, I respect that.

14 And it doesn't happen very  
15 often, I very rarely see it.

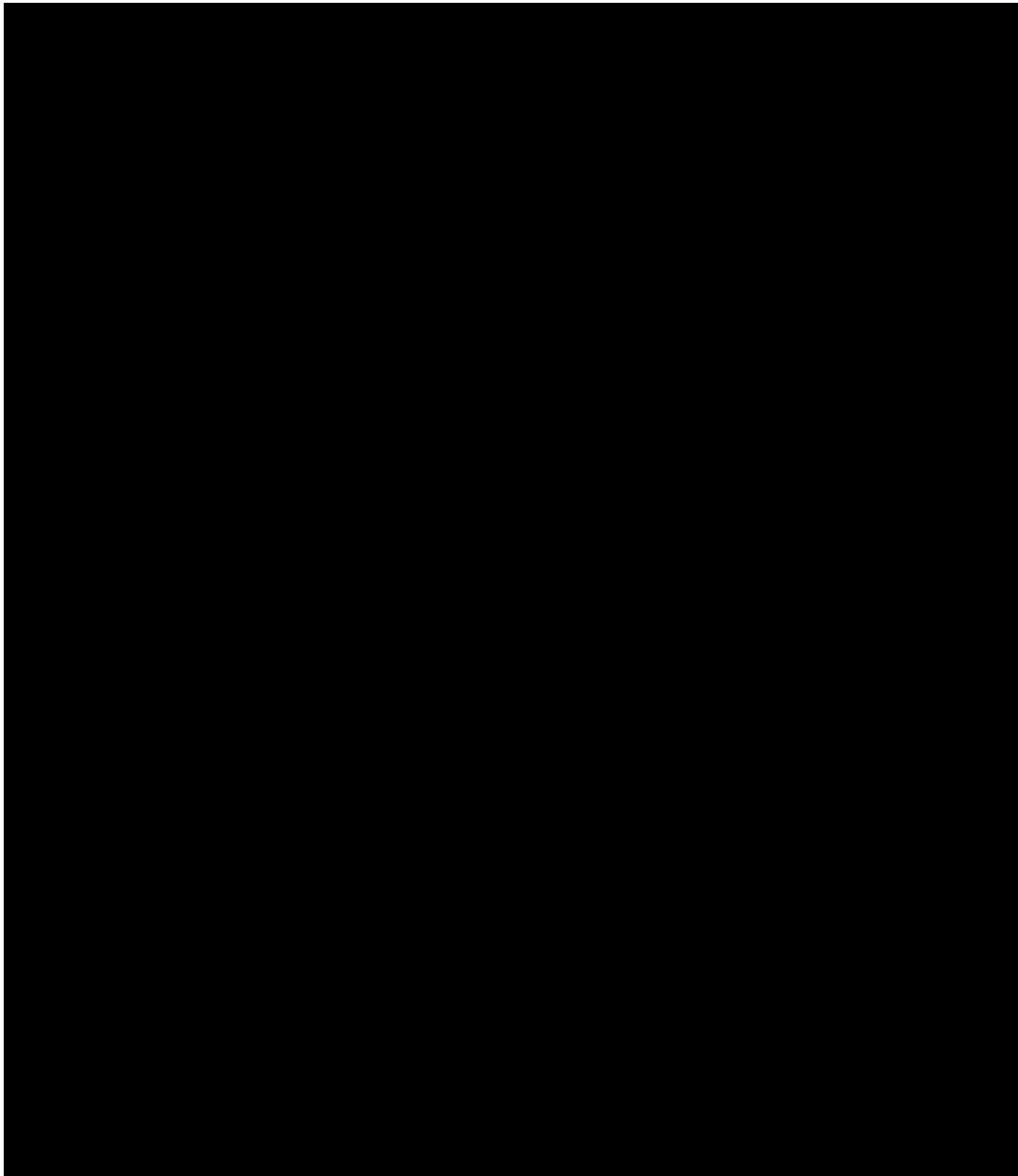
16 It wasn't something that I had  
17 ever thought about in my early career, because  
18 when I arrived in New York, the type of art --  
19 the type of art that I gravitated toward was  
20 such radical and independent work that nobody  
21 really needed to copyright their work because  
22 nothing was selling. Nothing sold.

23 It wasn't the point. The point  
24 was in the making -- when I arrived in the  
25 '70s, artists like Lawrence Weiner and Vito

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19           Q           I would like to show you an  
20 exhibit which I will mark as Exhibit 188.

21                       (The above described document was  
22 marked Exhibit 188 for identification, as  
23 of this date.)

24                       MR. BALLON: Also, when you do  
25 get a good breaking point, we will take

1 RICHARD PRINCE

2 MR. BALLON: Objection to post.

3 Do you mean his painting?

4 Q You can answer.

5 A Yeah, I don't understand the  
6 idea of what you're talking about when you say  
7 post.

8 Q When you found the rastajay92  
9 Instagram post --

10 A Yes.

11 Q -- and you saw he had posted a  
12 picture of a Rastafarian, did it remind you of  
13 the Canal Zone works?

14 A Yes.

15 Q How did it remind you of the  
16 Canal Zone works?

17 A It looked -- it was -- it looked  
18 like a -- I had the same reaction to rastajay's  
19 post of the Rastafarian that he posted.

20 I had -- I remember having the  
21 same reaction when I saw the Rastafarians in  
22 the YES RASTAFARIAN book.

23 They had a similar -- similar  
24 quality.

25 Q Was your New Portrait of the



1 RICHARD PRINCE

2 rastajay92 post a commentary on the Canal Zone  
3 case?

4 A I think it was more about,  
5 again, that idea of inherent meaning.

6 I had already established a  
7 territory where I had incorporated subject  
8 matter dealing with Rastafarian culture when I  
9 was led to rastajay.

10 Which was, again, when you're on  
11 Instagram, you discover people, usually by  
12 accident.

13 I wasn't necessarily looking,  
14 but when I found rastajay and I went through  
15 his feed, it simply reminded me of the  
16 Rastafarian work that I had started back in  
17 2003, and I thought it was a cool way to  
18 simply, a very cool way to keep that body of  
19 work relevant, up to date.

20 It was a new way of continuing  
21 that subject matter.

22 Q So, your New Portrait of  
23 rastajay92's post was a reference to the Canal  
24 Zone works?

25 A In part it was a reference.