

**Harm Suffered by the Plaintiffs
as a result of Sinclair's website: morrisseau.com**

Plaintiff	# of images identified on website	Retail value of paintings shown in images	Evidence of harm	Motion Record citations
Maslak McLeod Gallery	At least 75	\$1,336,000	<ul style="list-style-type: none"> Sales of Morrisseau paintings dropped from \$17,000 in Sept.-Oct. 2007 to \$7,000 in Sept.-Oct. 2008 	Affidavit of McLeod at paras 15-17, 20-22, 27, 28, 36 (Motion Record tab 3 at pp.41, 42, 44, 46) and Exhibits A, B, D, E, I, J
Bearclaw Gallery	At least 45	\$563,300	<ul style="list-style-type: none"> Sinclair has alleged fraud about 30 paintings Bearclaw has already sold, worth \$389,300. <u>Purchasers may sue Bearclaw or seek a refund due to Sinclair's allegations</u> Sinclair has alleged fraud about 15 paintings Bearclaw has for sale, worth \$174,000. It will be difficult or impossible to sell these paintings. 	Affidavit of Bugera at paras 9, 10, 24-25 (Motion Record tab 4 at pp.136, 139) and Exhibits A and B
White Distribution	At least 24	\$753,500	<ul style="list-style-type: none"> 4th quarter sales of Morrisseau paintings in 2007 were \$160,000. 4th quarter sales of Morrisseaus in 2008 are \$7,000 White's biggest customer has taken down White Distribution-owned paintings worth \$200,000 as a direct result of Sinclair's allegations on the website 	Affidavit of White at paras 11, 12, 31-33 (Motion Record tab 6 at pp. 325, 329, 330) and Exhibits B, C, D and H
Artworld of Sherway	At least 36	\$572,000	<ul style="list-style-type: none"> Sales of Morrisseau paintings in Sept.-Oct. 2007 were \$20,000. Artworld has sold <i>no</i> Morrisseaus in Sept.-Oct. 2008 	Affidavit of Child at paras 9-10, 26 (Motion Record tab 5 at pp.230, 234) and Exhibits A, B
Gallery Sunami	At least 12	\$167,000	<ul style="list-style-type: none"> Has lost the sales of 11 Morrisseau paintings valued at \$142,000 as a direct result of Sinclair's allegations on the website 	Affidavit of Kim at paras 9, 25 (Motion Record tab 2 at pp.9, 13), and Exhibits A, B, C

*affidavit of White
might happen*

Chart setting out evidence of harm to the Plaintiffs caused by Sinclair's statements and allegations on morrisseau.com