

55	Graves, Nancy	Omon (Series E) 1976 (Wax crayon on paper, 35" x 47-1/4")	3,000
56	Meadmore, Clement	Untitled, 1992 (Bronze, Height: 8-1/2")	3,000
57	Noland, Kenneth	Hand Painted Bookcover, 1977 (Acrylic on canvas, 11" x 12")	2,000
58	Hamilton, Juan	Abstract Form # 52, 1975 (Height: 14-1/2")	1,750
59	Love, Jim	Monday Morning: What to do ... What to do, 1992 (Welded Steel, 8" x 8")	1,200
60	Love, Jim	Looking for Santa Claus (welded steel, 9-3/8" x 8")	1,200
61	Stella, Frank	Pastel Stack, 1970 (28" x 41")	900
62	Fuller, Sue	String Composition # 213, 1963 (Nylon & Saran thread with Plexiglas, 36" x 36")	750
63	N/A	Sepik River Carved Polychrome Wood Mask, 20th Century (Height: 64"; Width: 22")	250
64	N/A	Sepik River Carved and Polychrome-Painted Wood Shield, 20th Century (Height: 69-1/2"; Width: 14")	100
Total			24,580,650

***138 APPENDIX B**

<i>Nash category</i>	<i>Artist</i>	<i>Title/year</i>	<i>Option 1 discount</i>	<i>Option 2 discount</i>	<i>Concluded discount</i>	<i>Fair market value of interest</i>
I	Johns, J.	Figure 4, 1967	71.72%	70.31%	70.31%	\$1,735,188
I	Pollock, J.	Untitled, Number 21, 1949	51.69%	59.68%	51.69%	1,449,210
I	Moore, H.	Two-Piece Reclining Figure No. 3, 1961	51.69%	66.89%	51.69%	966,140

I	Francis, S.	Green Gold, 1956	65.78%	68.95%	65.78%	624,926
I	Motherwell, R.	Elegy to Spanish Republic # 134, 1976	65.78%	84.64%	65.78%	374,956
II	Twombly, C.	Untitled, 1971	71.08%	84.64%	71.08%	316,948
II	Hockney, D.	Pool on Sprayed Blue Paper ... 1978	71.08%	100.00%	71.08%	190,169
III	Bravo, C.	Blue and Brown Package, 1971	79.74%	100.00%	79.74%	140,640
III	Bravo, C.	Wrapped Canvas, 1973	79.74%	100.00%	79.74%	140,640
II	Kelly, E.	Yellow Panel, 1985	71.08%	67.43%	67.43%	190,350
II	Moore, H.	Standing Figure (Internal Form)	71.08%	75.70%	71.08%	126,779
II	Cezanne, P.	Pot de geraniums, ca. 1885	71.08%	79.90%	71.08%	116,214
II	Soulages, P.	8 June 61, 1961	71.08%	80.00%	71.08%	116,214
II	Magritte, R.	La lecon des tenebres, 1964	71.08%	91.19%	71.08%	95,084
II	Picasso, P.	Baigneuse debout, 1925	71.08%	96.83%	71.08%	86,770
II	Albers, J.	Study for Homage to a Square in White Light, 1968	71.08%	98.98%	71.08%	84,519
II	Johns, J.	Three Flags, 1977	71.08%	98.98%	71.08%	84,519
II	Hofmann, H.	Adagio, 1962	71.08%	100.00%	71.08%	79,237
II	Louis, M.	Delta Epsilon, 1960	71.08%	100.00%	71.08%	79,237
II	Ernst, M.	The Elements ..., 1962	71.08%	100.00%	71.08%	73,954
II	Moore, H.	Family Group, 1944	71.08%	100.00%	71.08%	73,954
II	De Kooning, W.	Woman in a Garden, 1968	71.08%	100.00%	71.08%	63,390
II	Louis, M.	Achenar, 1962	71.08%	100.00%	71.08%	46,486

II	Moore, H.	Working Model for Thin Reclining Figure, 1978	71.08%	100.00%	71.08%	42,260
II	Frankenthaler, H.	Fathom, 1983	71.08%	100.00%	71.08%	38,034
III	Bravo, C.	Silver and Gold, 1972	79.74%	100.00%	79.74%	44,413
III	Rickey, G.	Untitled (Open Rectangles), ca.1985	79.74%	100.00%	79.74%	44,413
III	Botero, F.	Parrot, 1981	79.74%	100.00%	79.74%	29,608
III	Kline, F.	The Hill, 1959	79.74%	100.00%	79.74%	29,608
III	Hofmann, H.	Untitled (M-418), 1964	79.74%	100.00%	79.74%	22,206
III	Olitski, J.	Carnegie Hall, ca.1962-64	79.74%	100.00%	79.74%	22,206
III	Hockney, D.	Nichols Canyon Road, Hollywood Boulevard, 1979	79.74%	100.00%	79.74%	20,726
III	Heizer, M.	Untitled, ca.1985	79.74%	100.00%	79.74%	14,804
III	Di Suvero, M.	Untitled, ca.1968	79.74%	100.00%	79.74%	13,324
III	Bertoia, H.	Sunburst, 1972	79.74%	100.00%	79.74%	11,843
III	Frankenthaler, H.	Untitled, ca.1975	79.74%	100.00%	79.74%	8,883
III	Bertoia, H.	Untitled (Sounding Sculpture), 1968	79.74%	100.00%	79.74%	7,402
III	Motherwell, R.	In green with Two Scarlet Spots, 1967	79.74%	100.00%	79.74%	7,402
III	Held, A.	North by Northwest, 1973	79.74%	100.00%	79.74%	6,218
III	Hofmann, H.	Untitled, 1949	79.74%	100.00%	79.74%	5,922
III	Dine, J.	Tie, 1961	79.74%	100.00%	79.74%	5,181
III	Bertoia, H.	Untitled	79.74%	100.00%	79.74%	4,441
III	Frankenthaler, H.	Canal Street VIII, 1987	79.74%	100.00%	79.74%	3,701
III	Craig-Martin, M.	Safety Pin, ca.1990	79.74%	100.00%	79.74%	3,257

III	Hofmann, H.	Untitled (N-677-2), 1956	79.74%	100.00%	79.74%	2,961
III	Hofmann, H.	Fluse # 12 (M-1351), 1962	79.74%	100.00%	79.74%	2,961
III	Nagare, M.	Destination, 1996	79.74%	100.00%	79.74%	2,665
III	Motherwell, R.	Je t'aime avec noir, 1978	79.74%	100.00%	79.74%	2,221
III	Graves, N.	Four Times Four, 1977	79.74%	100.00%	79.74%	1,184
III	Hofmann, H.	Untitled, 1954	79.74%	100.00%	79.74%	888
III	Frankenthaler, H.	Thanksgiving Day, 1980	79.74%	100.00%	79.74%	592
III	Frankenthaler, H.	Thanksgiving Day, ca.1980	79.74%	100.00%	79.74%	592
III	N/A	Japanese Painted and Silvered Paper Four-Panel Screen, 3d Quarter, 19th Century	79.74%	100.00%	79.74%	592
III	Frankenthaler, H.	Hand Painted Book Cover # 11, 1970	79.74%	100.00%	79.74%	518
III	Graves, N.	Omon (Series E), 1976	79.74%	100.00%	79.74%	444
III	Meadmore, C.	Untitled, 1992	79.74%	100.00%	79.74%	444
III	Noland, K.	Hand Painted Bookcover, 1977	79.74%	100.00%	79.74%	296
III	Hamilton, J.	Abstract Form # 52, 1975	79.74%	100.00%	79.74%	259
III	Love, J.	Monday Morning: What to do ... What to do, 1992	79.74%	100.00%	79.74%	178
III	Love, J.	Looking for Santa Claus	79.74%	100.00%	79.74%	178
III	Stella, F.	Pastel Stack, 1970	79.74%	100.00%	79.74%	133
III	Fuller, S.	String Composition # 213, 1963	79.74%	100.00%	79.74%	111

III	N/A	Sepik River Carved Polychrome Wood Mask, 20th Century	79.74%	100.00%	79.74%	37
III	N/A	Sepik River Carved and Polychrome— Painted Wood Shield, 20th Century	79.74%	100.00%	79.74%	15

***139 APPENDIX C**

**VALUES OF DECEDENT'S INTERESTS
IN THE 64 WORKS OF ART FOR
FEDERAL ESTATE TAX PURPOSES**

<i>Item</i>	<i>Artist</i>	<i>Title/year</i>	<i>Decedent's pro rata share of stipulated fair market value¹</i>	<i>Fair market value of decedent's interest after application of 10% discount</i>
1	Pollock, Jackson	Untitled, Number 21, 1949	\$3,000,000	\$2,700,000
2	Moore, Henry	Two-Piece Reclining Figure No. 3, 1961	2,000,000	1,800,000
3	Picasso, Pablo	Baigneuse debout, 1925	300,000	270,000
4	Johns, Jasper	Figure 4, 1967	5,844,400	5,259,960
5	Francis, Sam	Green Gold, 1956	1,826,375	1,643,738
6	Motherwell, Robert	Elegy to Spanish Republic # 134, 1976	1,095,825	986,243
7	Twombly, Cy	Untitled, 1971	1,095,825	986,243
8	Hockney, David	Pool on Sprayed Blue Paper ... 1978	657,495	591,746
9	Kelly, Ellsworth	Yellow Panel, 1985	584,440	525,996
10	Moore, Henry	Standing Figure (Internal Form)	438,330	394,497
11	Cezanne, Paul	Pot de geraniums, ca. 1885	401,803	361,623
12	Soulages, Pierre	8 June 61, 1961	401,803	361,623
13	Magritte, Rene	La lecon des tenebres, 1964	328,748	295,873
14	Albers, Joseph	Study for Homage to a Square in White Light, 1968	292,220	262,998