# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LESLIE S. KLINGER, an individual,	)
Plaintiff,	) Case No.: 1:13-cv-01226
v.	) Judge: Ruben Castillo
CONAN DOYLE ESTATE LTD., a business entity organized under the laws of the United Kingdom,	) ) Magistrate Judge: Sheila Finnegar )
Defendant.	) ) )

# AFFIDAVIT OF H. GEORGE FLETCHER

STATE OF NEW YORK	)
	) ss.
COUNTY OF NEW YORK	)

- H. George Fletcher, being duly sworn on his oath, states as follows:
- 1. I have personal knowledge of the facts contained in this affidavit and as described below.
- 2. I have been professionally involved in publishing and literary curatorial work throughout my entire adult life. My résumé is attached to this affidavit as Exhibit A.
- 3. I am a widely known authority on the Sherlock Holmes stories, and author of many essays and papers about them. I hold the Baker Street Irregulars' Two-Shilling Award "for extraordinary devotion to the cause beyond the call of duty," and head a separate scholarly society, The Five Orange Pips founded in New York in 1935, which the BSI's founder Christopher Morley called "Sherlockiana's Institute of Higher Studies."

- 4. Following Army service as a counterintelligence agent in Cold War Germany, I spent twenty-four years at Fordham University Press, eventually as its Director and Editor-in-Chief, which included publishing and occasionally co-editing the *Baker Street Journal*, a quarterly periodical of the Sherlock Holmes club the Baker Street Irregulars of which I have been a member since 1969, across five of its editorships.
- 5. From Fordham University Press I went to the Pierpont Morgan Library in New York in 1991, where I was Astor Curator for Printed Books and Bindings for the next seven and a half years.
- 6. For another ten years starting in 1998, I was the New York Public Library's inaugural Brooke Russell Astor Director of Special Collections, in charge of a dozen Library divisions of rare materials, and Administrator of the Library's public exhibitions program from 1999 to 2008, plus two additional years as a consultant there.
- 7. In my retirement I have remained active in literary affairs. As a forty-year member of the Grolier Club, America's oldest and premier bibliophile society, I have chaired many of its committees, periodically designed exhibitions of its rare-books collections and ephemera (in addition to other such exhibitions for the Morgan Library and the New York Public Library since 2009), and authored and edited numerous books, exhibition catalogues, and scholarly articles on the history of early printing and book arts generally. I currently serve as a consulting editor to the American Trust for the British Library. I also currently write a series of feature stories on cultural heritage topics for the *Wall Street Journal* Reviews section.
- 8. I have reviewed "Plaintiff's Local Rule 56.1(a)(3) Statement of Material Facts in Support of His Motion for Summary Judgment ("Plaintiff's Statement of Material Facts") and Defendant's Rule 56.1(b)(3) Response to Plaintiff's Statement of Material Facts and Statement

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of Additional Material Facts ("Conan Doyle's Statement of Additional Material Facts"), and am

personally familiar with their contents.

9. I have personal knowledge of the facts contained in Conan Doyle's Statement of

Additional Material Facts and made in response to the following paragraphs of Plaintiff's

Statement of Material Facts and know them to be true and accurate: ¶¶ 2, 10, 14, 16, 17, 22 and

23.

10. I have personal knowledge of the facts contained in the following paragraphs in

Conan Doyle's Statement of Additional Material Facts and know them to be true and accurate:

 $\P$  2, 3, 4, 5, 6, 9 and 10.

[remainder of page intentionally left blank]

3

Further your Affiant sayeth naught.

H. GEORGE FLETCHER

The foregoing Affidavit of H. George Fletcher was subscribed and sworn before me on

September 9, 2013.

Notary Public

My commission expires:

YADIRA GARCIA
Notary Public, State of New Yo
Qualified in New York County
Rep. No. 0150676 2010

Reg. No. 01GA62130

# H. GEORGE FLETCHER

300 Central Park West Apartment 2F2 New York, New York 10024-1576

## Eduation:

Brooklyn Preparatory School, 1958

A.B., Fordham College, 1962

M.A., Fordham University, 1970

Fellow, German Academic Exchange Service, 1962-1963

Postgraduate studies, Ludwig-Maximilians-Universität, Munich, 1962-1963

Languages: Classical Greek and Latin, Medieval Latin, English, German, French, Italian, Spanish, Dutch (facility varies)

Chevalier de l'ordre des arts et des lettres, conferred by the French Republic in April 2013

Served, U.S. Army, 1963-1966 (Military Intelligence agent, Germany)

# Employment:

Fordham University Press, 1966-1990

Asst. Editor – Editor, 1966-1972

Director and Editor in Chief, 1972-1990

Managing Editor, *Traditio: Studies in Ancient and Medieval History, Thought, and Religion*, 1972-1990

The Pierpont Morgan Library (now The Morgan Library & Museum), 1991-1998 Astor Curator of Printed Books and Bindings

The New York Public Library, Astor, Lenox and Tilden Foundations, 1998-2010

Brooke Russell Astor Director for Special Collections, 1998-2008

Administrator, Exhibitions Programs, 1999-2008

Acting Director, Humanities and Social Sciences Library, 2003-2004

Consultant on Exhibitions, 2008-2010

# **Exhibitions:**

Approximately 100, from 1991 to the present, as administrator, organizer, curator/co-curator, at New York: the Morgan, the New York Public Library, the Grolier Club; Los Angeles: UCLA, the Armand Hammer Museum, the Getty Research Institute; Paris: Bibliothèque nationale de France, Bibliothèque de l'Arsenal, Bibliothèque littéraire Jacques Doucet, Bibliothèque Ste-Geneviève; London: British Library, Tate Britain; Wormsley (U.K.): Sir Paul Getty Library. Highlights include the following (reviewed in *The New York Times* and in various bibliographical/bibliophilic periodicals):

Gutenberg and the Genesis of Printing

Being William Morris

In Praise of Aldus Manutius

The Painted Page

The Wormsley Library

Utopia

The Declaration of Independence

Renaissance Bookbindings for Henri II

The Art Deco Bookbindings of Pierre Legrain and Rose Adler

French Book Art | Livres d'artiste: Artists and Poets in Dialogue

The Splendor of the Word

Eon: the Artist and the Book in Japan

Between Collaboration and Resistance: French Literary Life under Nazi Occupation

Three Faiths: Judaism, Christianity, Islam

Printing for Kingdom, Empire, and Republic: Treasures from the Archives of the Imprimerie nationale de France

## Published work

#### Books:

Printing for Kingdom, Empire, and Republic: Treasures from the Archives of the Imprimerie nationale (Paris & New York, 2011)

Ma bibliotheque, c'est moi, with Bertrand Dorny (Paris, 2006; 2nd ed. 2009)

Art Deco Bookbindings: the Work of Pierre Legrain and Rose Adler (New York, 2004)

*The Wormsley Library: Personal Selections by Sir Paul Getty, K.B.E.* (London & New York, 1999; 2<sup>nd</sup> ed. 2007)

In Praise of Aldus Manutius: a Quincentenary Exhibition (New York & Los Angeles, 1995)

Gutenberg and the Genesis of Printing (New York, 1994; 2 editions)

Christopher Morley's New York (New York 1988)

New Aldine Studies: Documentary Essays on the Life and Work of Aldus Manutius (San Francisco 1988)

A Miscellany for Bibliophiles (New York, 1979)

Paradosis: Studies in Memory of E. A. Quain (New York, 1976)

The Heritage of New York (New York, 1970)

#### Contributed works:

Afterword to *The Medici Aesop*, by Bernard McTigue (New York, 2005)

Entries on the 1488/9 Florentine Homer, the 1499 Hypnerotomachia Poliphili, and the 1495-1498 Aldine Aristotle, in *The World from Here*, ed. Cynthia Berlingham & Bruce Whiteman (Los Angeles, 2001)

Foreword to Aldine Press Books at the Harry Ransom Humanities Research Center, The University of Texas at Austin, by Craig W. Kallendorf & Maria X. Wells (Austin, 1998) Afterword to Gutenberg's Gift, by Nancy Willard, illus. by Bryan Leister (San Diego, New

York, & Baltimore, 1995)

"Before the Rise: The Grillparzer Book" in *Irregular Memories of the 'Thirties*, by Jon L. Lellenberg (New York, 1990)

Afterword to *The Memoirs of Sherlock Holmes* (Pleasantville, 1988)

Afterword to "The Adventure of the Priory School" in *The Baker Street Dozen*, ed. Pj Doyle & E. W. McDiarmid (New York & Chicago, 1987)

"Over against St. Paul's" in Miscellany for Bibliophiles

# Articles:

- "A Royal French Privilege for Paolo Manutio, Folembray, 30 November 1546" in PBSA: Papers of the Bibliographical Society of America 106 No. 3 (September 2012), 373-382
- "A Manuscript Aldine Catalogue from the Mid-Sixteenth Century, with an Appendix on the Third Aldine Catalogue of [March 1527]" in *Gutenberg-Jahrbuch* 86 (2011), 131-174
- "Manuscript Corrections in the Aldine Strozzi of 1513" in *The Books of Venice* | *Il Libro Veneziano* (= *Miscellanea Marciana* 20 [2005-2007]), ed. Lisa Pon & Craig Kallendorf (Venice & New Castle, 2008), 191-206
- "Aldus, UCLA, and me" in Printing History N.S. 5 (January 2009), 3-13
- "Renaissance Bindings for Henri II" in Bulletin du Bibliophile 2002 No. 2, 425-426
- "Indomitable Collector: George Arents Jr. and The New York Public Library" in *Biblion* 9 Nos. 1/2 (Fall 2000 / Spring 2001), 87-103
- "George Arents, 7 May 1875 13 December 1960" in *Grolier 2000* (New York, 2000), 8-11 "Smoking out one's audience" in The Best of the Pips II: More Papers on the Sundial (= *Baker Street Journal* 1999 Christmas Annual), 29-34
- "Paulus Manutius in Aedibus Populi Romani: the Campaign for Rome" in Villa I Tatti, *Aldus Manutius and Renaissance Culture: Essays in Memory of Franklin D. Murphy*, ed. David S. Zeidberg (Florence, 1998), 287-321
- "Aldus and Greek Learning" in *Papers of the Bibliographical Society of Canada* 35 No. 1 (Spring 1997), 11-37
- "The Final Dispersal of the Henric-Petri Shop: a 1659 Leipzig Witness" in *Gutenberg-Jahrbuch* 70 (1995), 184-185
- "The Ideal of the Humanist Scholar-Printer: Aldus in Venice" in *Printing History* 30 (Vol. 15 No. 2; 1993), 3-12
- "The New York Connection: Holmes Hargreave" in *The Baker Street Journal* N.S. 42 No. 4 (December 1992), 214-220
- "That Bashful British Meiosis" in The Baker Street Journal N.S. 36 No. 4 (December 1986), 199
- "Manhattan Evenings" in The Baker Street Journal N.S. 36 No. 2 (June 1986), 81-84
- "Sighting in on Watson's Bull Pup" in *The Baker Street Journal* N.S. 21 No. 3 (September 1971), 156-157

## Bibliographical reviews:

Stephan Füssell & Corinna Norrick, editors, *Gutenberg-Jahrbuch* 2012, in *Publishing Research Quarterly* 29 No. 2 (June 2013), 197-198

Anthony Hobson, *Renaissance Book Collecting: Jean Grolier and Diego Hurtado de Mendoza. Their Books and Bindings* (Cambridge, 1999), in PBSA 98 No. 2 (June 2004), 235-237

Marie-Pierre Laffitte & Fabienne Le Bars, *Relieurs royales de la Renaissance: la Librairie de Fontainebleau*, 1544-1570 (Paris, 1999), in PBSA 95 No. 2 (June 2001), 254-260

Manfred von Arnim, Europäische Einbandkunst aus sechs Jahrhunderten (Schweinfurt, 1992), in Bookways No. 9 (October 1993), 65-67

Howard M. Nixon & Mirjam M. Foot, *The History of Decorated Bookbinding in England* (Oxford, 1992), in *Bookways* No. 7 (April 1993), 57-60

Nicolas Barker, Aldus Manutius and the Development of Greek Script & Type in the Fifteenth Century (Sandy Hook, 1985), in Printing History 8 No. 2 (December 1986) 40-42

Martin Lowry, *The World of Aldus Manutius: Business and Scholarship in Renaissance Venice* (Oxford & Ithaca, 1979), in *Fine Print* 6 No. 2 (April 1980) 63-65

"Masterpiece" Essays in the weekend Review section of *The Wall Street Journal*:

The Rood Loft of the Church of St-Étienne du Mont (1530s): A Bridge to Eternity, WSJ, April 21-22, 2012, p. C13

The Illuminations of Girolamo da Cremona, in Peter Ugelheimer's Works of Aristotle (1483): Illuminating Philosophy, WSJ, June 23-24, 2012, p. C13

The Gubbio Studiolo of Federico da Montefeltro: The Room Is the View, WSJ, September 1-2, 2012, p. C13

Bibliothèque Ste-Geneviève (1850), Paris, by Henri Labrouste: A Soaring Space for Artifacts and Ideas, WSJ, April 27-28, 2013, p. C13

"The Compleat Angler" (1653) by Izaak Walton: It Has Hooked Generations of Fishermen, WSJ, May 25-26, 2013, p. C19

#### Lectures:

Typefonts for Humanists: the roman, greek, and italic Typefaces of Aldus Manutius, 1495-1502" at Cooper Union, 28 October 2013

- "An Unpublished 1560s Manuscript Catalogue of the Aldine Press" at the conference on the Sixteenth-Century Book, Bodleian Centre for the Book, All Souls College, Oxford, 29 February 2008
- "Aldus, UCLA, and me" keynote address, American Printing History Association annual conference, University of California, Los Angeles, 11 October 2007
- "Manuscript Corrections in the 1513 Aldine Strozzi" at Il libro Veneziano conference, Istituto Veneto, Venice, 9 March 2007
- "Aldus and Greek Learning" at the conference on Culture and Printing in Venice: 500 Years of the Aldine Press, at McGill University, Montreal, 20 October 1995
- "The Printing Wizard of Venice: Aldus at 500" the 1995 Betty Ann Elliott Lecture, 16<sup>th</sup> annual International Festival of Authors at Harbourfront, Toronto, 15 October 1995
- "Paulus Manutius in Aedibus Populi Romani: the Aldine Press moves to Rome" at the Morgan Library symposium for the Renaissance Society of America, 30 March 1995 (repeated for a faculty conference at Columbia University)
- "Paulus Manutius in Aedibus Populi Romani" at the Aldus Manutius and Renaissance Culture conference, Villa I Tatti of Harvard University, Florence, 16 June 1994
- "A Definition of the Humanist Scholar-Printer: Aldus Manutius" at the 18<sup>th</sup> annual conference The Humanist Printer, American Printing History Association, Brown University, Providence, 2 October 1993
- "J. P. Morgan, Jr., his library and his legacy" at the Morgan Library, 15 June 1993
- "Illuminating the Printed Word: Miniaturists and Printers at Venice in the 1470s and 1480s" for Save Venice, Inc., at the Morgan Library, 19 January 1993
- "From Private to Independent: Collecting for Mr. Morgan's Library and for The Pierpont Morgan Library" at the Celebrating American Collectors of Rare Books and Manuscripts symposium, Getty Center for the History of Art and the Humanities, Santa Monica, 15 October 1992
- "Historic Bookbindings" for the staff and students of the Conservation of Rare Books and Manuscripts Department, West Dean College, West Dean near Chicester (U.K.), 14 November 1991

## Works in progress:

The Transactions and Gazette of The Grolier Club: an Index, compiled by Szilvia Szmuk-Tanenbaum & Carol Rothkopf, edited by HGF (New York, forthcoming)

Exhibition and catalogue to mark the 500<sup>th</sup> anniversary of the death of Aldus Manutius on 6 February 1515, to be held February-April 2015 at The Grolier Club

Exhibition to showcase the treasures of the Bibliothèque Ste-Geneviève, Paris, at The Grolier Club, November 2015 – February 2016

Forthcoming "Masterpiece" essays for The Wall Street Journal

A critical edition of a score of unpublished letters from Pietro Cardinal Bembo to Rodolfo Cardinal Pio di Savoia, 1526-1540

# Memberships:

The Grolier Club of the City of New York, elected 1973

Member of the Council, 1974-1987; January 2013 to present

Committee on Publications, 1975-1988; chair, 1977-1981; chair designate from January 2014

Committee on Admissions, 1978-1985; chair 1982-1986

House Committee, 1981-1987; chair, 1986

Committee on Public Exhibitions, 1998-1999

The Baker Street Irregulars, investitured 1969

Publisher, The Baker Street Journal, 1975-1990; Editorial board, 1967-1990

The Five Orange Pips

The Typophiles