## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

)
) ) ) Case No. 1:07-cv-1532
) (EGS/JMF)
)
)

## DEFENDANTS' MOTION TO STAY PRODUCTION OF PRIVILEGED MATERIALS <u>PENDING RESOLUTION OF RULE 72 OBJECTIONS</u>

Defendants Animal Welfare Institute, The Fund for Animals, The Humane Society of the United States, and The Wildlife Advocacy Project (collectively, "Defendants"), by and through their undersigned counsel, respectfully submit this Motion to Stay Production of Privileged Materials Pending Resolution of Rule 72 Objections ("Motion to Stay"). The grounds for this Motion are set forth in the accompanying Memorandum of Points and Authorities that is submitted herewith.

In accordance with Local Rule 7(m), counsel for Defendants have met and conferred in good faith with counsel for Plaintiff Feld Entertainment, Inc. ("Feld") in an effort to resolve the issues presented by this Motion. Feld opposes the requested stay.

WHEREFORE, Defendants respectfully request that the Court grant this Motion to Stay in its entirety. A proposed Order is attached.

Date: March 12, 2014

Respectfully submitted, DEFENDANTS

By Counsel

/s/

Bernard J. DiMuro, Esq. (D.C. Bar No. 393020) Nina J. Ginsberg. Esq. (D.C. Bar No. 251496) Stephen L. Neal, Jr., Esq. (D.C. Bar No. 441405) Andrea L. Moseley, Esq. (D.C. Bar No. 502504) M. Jarrad Wright, Esq. (D.C. Bar No. 493727) **DIMUROGINSBERG, P.C.** 1101 King Street, Suite 610 Alexandria, Virginia 22314 Telephone: (703) 684-4333 Facsimile: (703) 548-3181 Emails: <u>bdimuro@dimuro.com</u>; nginsberg@dimuro.com; sneal@dimuro.com; amosley@dimuro.com; mjwright@dimuro.com

Counsel for Defendant Animal Welfare Institute

/s/

Roger E. Zuckerman, Esq. (D.C. Bar No. 134346) Andrew Caridas, Esq. (D.C. Bar No. 1005512) **ZUCKERMAN SPAEDER LLP** 1800 M Street, N.W., Suite 1000 Washington, D.C. 20036-1802 Telephone: (202) 778-1800 Facsimile: (202) 822-8106 Emails: <u>rzuckerman@zuckerman.com</u>; acaridas@zuckerman.com

and

/s/

Logan D. Smith, Esq. ((D.C. Bar No. 474314) ALEXANDER SMITH, LTD. 3525 Del Mar Heights Road, #766 San Diego, CA 92130 Telephone: (858) 444-0480 Email: logan@alexandersmithlaw.com

Counsel for Defendant The Fund for Animals, Inc.

/s/

Christian J. Mixter, Esq. (D.C. Bar No. 352328) W. Brad Nes, Esq. (D.C. Bar No. 975502)

## MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, N.W. Washington, D.C. 20004 Telephone: (202) 739-5779 Facsimile: (202) 739-3001 Emails: <u>cmixter@morganlewis.com;</u> <u>bnes@morganlewis.com</u>

*Counsel for Defendant The Humane Society of the United States* 

/s/

Stephen L. Braga, Esq. (D.C. Bar No. 366727) Kathleen M. Braga, Esq. (D.C. Bar No. 418830) LAW OFFICE OF STEPHEN L. BRAGA 3079 Woods Cove Lane Woodbridge, VA 22192 Telephone: (671) 304-7124 Email: slbraga@msn.com ; bragalaw@qmail.com

Counsel for Defendant The Wildlife Advocacy Project

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on this 12<sup>th</sup> day of March, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Stephen L. Neal, Jr.