# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO :

ANIMALS, et al.,

v.

:

Plaintiffs,

Case No. 1:03-CV-02006 (EGS/JMF)

RINGLING BROS. AND BARNUM &

BAILEY CIRCUS, et al.,

.

Defendants.

rengants.

### SUPPLEMENTAL NOTICE OF COMPLIANCE

As previously indicated in its October 11, 2006 Notice of Compliance, Feld

Entertainment, Inc. ("FEI") hereby provides the declarations of two additional employees,

Messrs. Metzler and Olmeda, who were on vacation at the time. Their declarations are attached hereto pursuant to the Court's September 26, 2006 Order.

Dated this 21<sup>st</sup> day of November, 2006.

Respectfully submitted,

John M. Simpson (D.C. Bar #256412)

Joseph T. Small, Jr. (D.C. Bar #926519)

Lisa Zeiler Joiner (D.C. Bar #465210)

Michelle C. Pardo (D.C. Bar #456004)

George A. Gasper (D.C. Bar #488988)

FULBRIGHT & JAWORSKI L.L.P.

801 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Telephone: (202) 662-0200 Facsimile: (202) 662-4643

Counsel for Defendant Feld Entertainment, Inc.

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Plaintiffs,

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RINGLING BROS. AND BARNUM &

BAILEY CIRCUS, et al.,

v.

:

Defendants.

<del>-----</del>:

#### **DECLARATION**

- I, Antonio Olmeda, declare under oath as follows:
- 1. I am employed by Feld Entertainment, Inc. as a Senior Handler on the Red Unit.
- 2. I have reviewed the Court's order in the above-captioned case dated September 26, 2006 ("Order").
- 3. I have searched for all records covered by the Order in my possession, custody or control.
  - 4. I am not responsible for recordkeeping, and I have no such records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15 day of NOVEMBER, 2006.

Antonio Olmeda

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, et al.,

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Case No. 1:03-CV-02006 (EGS/JMF)

RINGLING BROS. AND BARNUM & BAILEY CIRCUS, et al.,

:

Defendants.

: auts. :

### **DECLARATION**

- I, Troy Metzler, declare under oath as follows:
- 1. I am employed by Feld Entertainment, Inc. as the Superintendent of Elephants on the Blue Unit.
- 2. I have reviewed the Court's order in the above-captioned case dated September 26, 2006 ("Order").
- 3. I have searched for all records covered by the Order in my possession, custody or control.
  - 4. I am not responsible for recordkeeping, and I have no such records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this \_\_\_\_\_ day of \_\_\_\_\_\_, 2006.

Troy Metzler