



**PRIVILEGE LOG  
For All Plaintiffs**

Doc Type	Date	Author/Originator	Recipient(s)	Description	Basis for Withholding
Draft Letter	1/22/04	K. Meyer	NA	Draft FOIA letter	attorney work product
hand-written notations	2004	K. Meyer	NA	hand-written notations concerning documents plaintiffs may want to pursue under FOIA	attorney work product
internal memo to the file	2004	K. Meyer	NA	list of USDA investigations relevant to FOIA requests	attorney work product
internal memo to the file	2004	K. Meyer	NA	list of documents that plaintiffs have received under FOIA with notes about documents and which additional documents to pursue	attorney work product
internal memo to the file	2003	K. Meyer	NA	list of records withheld by USDA under FOIA with notes about the documents and which documents to pursue	attorney work product
internal memo to the file	2002	K. Meyer	NA	internal memo regarding documents to pursue under FOIA	attorney work product
internal memo to the file	2002	K. Meyer	NA	list of documents released under FOIA with notes about documents and what information to pursue	attorney work product
internal memo to the file	2003	K. Meyer	NA	list of subjects gleaned from FOIA documents with notations	attorney work product
internal memo to the file	2002-03	K. Meyer	NA	notes concerning documents released under FOIA	attorney work product
internal memo to the file	2002	K. Meyer	NA	notes concerning strategy to pursue documents under FOIA	attorney work product

fax cover sheet with hand-written notations	4/30/02	K. Meyer	Tom Rider	notations concerning FOIA documents	attorney-client priv.; attorney work product
internal memo	2002-03	K. Meyer	NA	notes concerning strategy to pursue documents under FOIA	attorney work product
hand-written notations	2004	K. Meyer	NA	hand-written notations concerning strategy to pursue documents under FOIA	attorney work product
hand-written notations	2003	K. Meyer	NA	hand-written notations concerning which documents have been received and which to pursue under FOIA	attorney work product
memo	9/1/2000	K. Meyer	Pat Derby	regarding FOIA strategy to obtain documents	attorney-client priv.; attorney work product
memo	11/26/01	K. Meyer	Plaintiffs	regarding FOIA strategy to obtain documents	attorney-client priv.; attorney work product
hand-written notes	2001-02	K. Meyer	NA	internal note to file regarding FOIA matters	attorney work product
internal memo to file	5/16/01	K. Meyer	NA	regarding documents to pursue under FOIA	attorney work product
memo	5/21/01	K. Meyer	Plaintiffs	regarding status of FOIA efforts	attorney-client priv.; attorney work product
hand-written notes	2001	K. Meyer	NA	regarding follow-up documents to request under FOIA	attorney work product
fax sheet with hand-written notes	4/16/99	Pat Derby	K. Meyer	regarding USDA investigations of Ringling	attorney-client priv.
hand-written notes	2003	K. Meyer	NA	regarding documents that had been released or withheld under FOIA	attorney work product

internal draft memo	2003	K. Meyer	NA	draft of information gleaned from documents released under FOIA	attorney work product
memos and hand-written notes	April - June, 2004	Between K. Meyer, K. Ockene and plaintiffs		memos and hand-written notes of meetings and phone conversations with clients regarding responses to discovery requests	attorney-client priv.
internal memo to file and hand written notations	2004	K. Meyer K. Ockene	NA	notes on what is show in videotapes and what evidence to pursue	attorney work product
internal memo to file and hand-written notes	2003	K. Meyer	NA	summary of information released under FOIA, and notes concerning information to pursue	attorney work product
hand-written note	2003	Cathy Liss, A WI	K. Meyer	note concerning information that may be relevant to case	attorney-client priv.
internal memos to file and hand-written notes	2003	K. Meyer	NA	summary of information released under FOIA, and notes concerning information to pursue	attorney work product
hand-written notes	2004	K. Meyer	NA	notes on what is shown in videotapes and what evidence to pursue	attorney work product
hand-written notes and internal memo to file	2003-04	K. Meyer	NA	notes on possible witnesses	attorney work product
hand-written notes	2000-2004	K. Meyer	NA	notes of phone conversations and interviews of Tom Rider	attorney client priv.; attorney work product
internal memo to file	April, 2000	K. Meyer	NA	notes on deposition of Tom Rider taken by Sharon Sims for PAWS	attorney work product
hand-written notes	July, 2000	K. Meyer	Tom Rider	advice concerning testimony about mistreatment of elephants	attorney-client priv.

memo	2002	volunteer for M & G	K. Meyer	description of circus performance for use in litigation	attorney work product
memo	4/5/04	Pat CuvIELlo	K. Meyer, K. Ockene	memo responding to request for information for use in litigation	attorney work product
memo	9/29/03	M & G law clerk	K. Meyer	legal research	attorney work product
internal memo to the file	1999	K. Meyer	NA	notes on deposition of Glenn Ewell taken by Sharon Sims for PAWS	attorney work product
e-mail exchange	4/27/04	Between K. Meyer and possible witness		regarding possible evidence to use in the litigation	attorney work product
memo	10/16/2001	K. Meyer	Plaintiffs	regarding PAWS RJCO Settlement	attorney work product
hand-written notes	2001	K. Meyer	NA	notes of phone conversation with clients	attorney-client priv. attorney work product
hand-written notes	1999	Betsy Swart, PAWS	K. Meyer	regarding draft legislation	attorney-client priv.; attorney work product
hand-written notes	1999	K. Meyer	NA	notes of phone conversation with client	attorney-client priv.; attorney work product
memo	12/18/98	M & G associate, Cara Romano	K. Meyer	advice concerning possible evidence	attorney work product
hand-written notes	1999	K. Meyer	NA	notes re preambles to Federal Registers on ESA regulations	attorney work product
hand-written notes	7/29/99	Pat Derby	K. Meyer	regarding death of elephant	attorney-client priv.
memo	Feb., 1999	Pat Derby	K. Meyer	regarding USDA inspection of Ringling	attorney-client priv.
hand-written notes	Feb. 1999	K. Meyer	NA	regarding USDA inspection of Ringling	attorney work product
memo with hand-written notes	2000	memo by Pat Derby; notes by K. Meyer		regarding USDA inspections of Ringling	attorney-client priv.; attorney work product

Draft letter to FWS	2000	K. Meyer	NA	draft of 60-day notice letter	attorney work product
hand-written notes; draft press release	1999	Betsy Swart; Pat Derby	K. Meyer	request for input and editing	attorney-client priv.
legal research	2004	M & G law clerks and associates	K. Meyer	memos and case law regarding discovery issues	attorney work product
witness folders	2003-04	K. Meyer	NA	notes and ideas regarding witnesses	attorney work product
Litigation files	2000-04	K. Meyer; M & G law clerks and associates	NA	pleading files, legal research; Court of Appeals briefs, <u>ASPCA v. Ringling</u> , Civ. Nos. Civ. No. 00-161, 03-2006	attorney work product <sup>1</sup>
hand-written notes; drafts of report	2002-03	K. Meyer, M & G paralegal	NA	notes and drafts of USDA Report for clients	attorney work product
edited draft report	2003	Cathy Liss, President of AWI	K. Meyer	edits provided to attorney on draft USDA Report	attorney-client priv.; attorney work product
Pleading files	2001-03	K. Meyer	NA	pleading file for <u>ASPCA v. USDA</u> , Civ. No. 01-2628 (DDC)	attorney-work product <sup>2</sup>
Letters	3/27/1998 7/29/98 4/3/2000	K. Meyer	Pat Derby	setting forth retainer agreement for various projects	attorney-client priv.; attorney-work product

<sup>1</sup> Defendants' counsel has copies of all final pleadings and briefs.

<sup>2</sup> Copies of the final pleadings are available from the district court.

internal memos to the file; attorney-client communications	2002-03	K. Meyer; Tanya Senerib, attorneys at M & G	clients in Born Free v. Norton, including AWI	memos to the file; memos, e-mails, and correspondence to clients regarding Born Free v. Norton, Civ. No. 03-00856 (D.D.C.) and No. 03-5216 (D.C. Cir.)	attorney-client priv.; attorney work product <sup>3</sup>
e-mails	2000-2004	Between K. Meyer, K. Ockene, and clients		communications regarding status of litigation, advice, recommendations, strategy	attorney-client priv.; attorney work product
e-mails	2000-2004	Among K. Meyer, K. Ockene, Tanya Senerib, Jon Lovvorn, M & G attorneys, and potential witnesses and sources of information		inquiries and responses regarding evidence and witnesses, prepared for possible use in litigation	attorney work product
hand-written notes	2000	K. Meyer	NA	notes concerning discussion with client concerning USDA proposal on handling of elephants	attorney-client priv.; attorney work product
hand-written notes	1999	K. Meyer	NA	notes of conversation with client regarding possible violations of law regarding captive orcas	attorney-client priv.; attorney work product
hand-written notes	9/12/98	K. Meyer	NA	notes of phone conversation with client regarding strategy	attorney-client priv.; attorney work product
hand-written notes of phone conversations with clients	3/1999	K. Meyer	NA	regarding strategy on various animal issues	attorney-client priv.; attorney work product

<sup>3</sup>These documents are being listed because AWI was also a client in that case which involved African elephants. Non-privileged documents are being produced by AWI in response to defendants' document production requests; pleadings and briefs are available from the district court and court of appeals.

hand-written notes	1999	K. Meyer	NA	regarding strategy to pursue various animal issues for PAWS	attorney work product
memo	9/25/98	K. Meyer	Betsy Swart, Pat Derby, Ed Stewart	summary of legal issues M & G had agreed to look into	attorney-client priv. attorney work product
memo	9/28/98	K. Meyer	D. J. Schubert Schubert & Assoc.	assigning research topics for project M & G was doing for PAWS	attorney-client priv. attorney work product
memo	2/23/99	D. J. Schubert, Schubert & Assoc.	K. Meyer	solicited input and ideas regarding project M & G was doing for PAWS	attorney-client priv. attorney work product
e-mails	1998-99	between K. Meyer and clients	same	regarding status of African elephant issues	attorney-client priv. attorney work product
hand-written notes	5/99	Betsy Swart	K. Meyer	seeking legal advice about project for PAWS	attorney-client priv.
hand-written notes	4/6/99	K. Meyer	NA	concerning phone conversation with Pat Derby regarding two legal projects M & G was handling for PAWS	attorney-client priv. attorney work product
hand-written notes	1999	K. Meyer	NA	regarding possible expert witnesses	attorney work product
hand-written notes	2000	K. Meyer	NA	internal notes regarding what information to pursue under FOIA; possible new evidence; phone conversations with Tom Rider	attorney work product; attorney-client priv.
internal memos	2000	M & G Associates; K. Meyer	K. Meyer	legal memos regarding issues in case; outlines of issues to address in opposition to motion to dismiss	attorney work product
hand-written notes	10/23/1998	Betsy Swart	K. Meyer	cover memo regarding materials forwarded from PAWS	attorney-client priv.; attorney work product



hand-written notes	?	K. Meyer	NA	regarding possible eye-witnesses	attorney work product
internal memo	10/22/02	Jon Lovvorn, M & G	K. Meyer	memo regarding standing issues	attorney work product
internal memo; hand-written notes; memos to clients	2000-01	K. Meyer	some to clients	master file regarding client information; memo to clients regarding Judge Sullivan's ruling on motion to dismiss	attorney work product attorney-client priv.
drafts of amended complaint; hand-written notes on complaint; memos to and from clients re complaint	2000	K. Meyer; clients	same	draft amended complaint; clients comments on complaint; hand-written edits on complaint	attorney-client priv. attorney work product
legal research	2001	case law		legal research regarding issues in case	attorney work product
memo	8/10/2000	K. Meyer	plaintiffs	memo regarding Amended Complaint	attorney client priv.
hand-written notes; legal research	?	K. Meyer and M & G Associates	same	regarding response to motion to dismiss	attorney work product
legal research	?	K. Meyer and M & G Associates	same	regarding standing issues raised in motion to dismiss	attorney work product
internal memo	2003	K. Meyer	NA	re topics to cover in conference call with clients	attorney work product; attorney-client priv.
hand-written notes	2000	K. Meyer	NA	telephone conversation with Betsy Swart, of PAWS	attorney-client priv.
internal memos; legal research; notes from clients	2000	K. Meyer, Dan Vice, Associate with M & G; note from Cathy Liss, AWI	K. Meyer, Dan Vice	legal research and ideas for case; communication between AWI and M & G	attorney work product; attorney-client priv.



**PRIVILEGE LOG**  
**for All Plaintiffs**  
**(Partial Release)**

Doc Type	Bates No.	Date	Author/Originator	Recipient(s)	Description	Basis for Withholding
draft exhibit label on draft Slip.	PL - 01333	2003	K. Meyer	NA	draft exhibit label on draft stipulation	attorney work product
draft exhibit label on list of docs	PL - 01336	2003	K. Meyer	NA	draft exhibit label on list of docs	attorney work product
hand-written notation.	PL - 01428	2003	K. Meyer	NA	notation on USDA document	attorney work product
hand-written notations	PL - 02765	2004	K. Meyer	NA	notations on Ringling website excerpt	attorney work product
hand-written notations	PL - 02772	2003-04	K. Meyer	NA	notations on Salon article	attorney work product
hand-written notations regarding name	PL - 02801	9/8/99		K. Meyer	hand-written notation of name of source of information concerning Clyde-Beatty circus	attorney work product
hand-written notations	PL - 02804	2003	K. Meyer	NA	hand-written notations on USDA document	attorney work product
hand-written notations	PL - 02806	2003	K. Meyer	NA	hand-written notations on USDA document	attorney work product
hand-written notations	PL - 02809	2003	K. Meyer	NA	hand-written notations on USDA document	attorney work product

