

PLAINTIFFS' EXHIBIT 6

To Plaintiffs' Opposition to Defendants' Motion to
Compel Discovery from Plaintiff Tom Rider and For
Sanctions, Including Dismissal
Civ. No. 03-2006 (EGS/JMF)

American Society for the Prevention of Cruelty of Animals, et al. v. Ringling Bros. Barnum & Bailey Circus et al., No. 03-2006 (D.D.C.)

Second Supplemental Privilege Log

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
37		7/24/02	Jeannie Perron			Outside counsel's notes of conversation with USDA	Work Product
38		8/8/2004	Julie Strauss	Jeannie Perron		E-mail attaching press release for outside counsel's review	Attorney-Client
39		5/28/98	Jeannie Perron			File memorandum drafted by outside counsel summarizing witness interview done in connection with USDA investigation	Attorney-Client; Work Product
40		5/28/98	Jeannie Perron			File memorandum drafted by outside counsel summarizing witness interview done in connection with USDA investigation	Attorney-Client; Work Product
41		5/4/98	Jeannie Perron			File memorandum drafted by outside counsel summarizing witness interviews done in connection with USDA investigation	Attorney-Client; Work Product
42		5/8/98	Jeannie Perron			Outside counsel's chronology of events in witness affidavits created in connection with USDA investigation	Attorney-Client; Work Product
43		6/19/98	Jeannie Perron			Preliminary draft of pleading in USDA administrative proceeding	Work Product
44		6/10/98	Jeannie Perron	Michael Schmidt		Fax providing comments on opinion to be filed in USDA administrative proceeding	Work Product
45		6/10/98	Jeannie Perron			Hard copy of e-mail with outside counsel's handwritten notes regarding expert opinion to be filed in USDA administrative proceeding	Work Product
46		5/28/98	Jeannie Perron			File memorandum prepared by outside counsel summarizing meeting with potential expert witness in USDA proceeding	Work Product
47		5/6/98	Jeannie Perron			Outside counsel's handwritten notes of interview with potential expert witness in USDA proceeding	Work Product
48		5/5/98	Jeannie Perron			File memorandum drafted by outside counsel summarizing witness interviews done in connection with USDA investigation, including fax cover	Attorney-Client; Work Product

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
49		Undated	Jeannie Perron			Outside counsel's notes taken during meetings with client staff in connection with USDA investigation	Work Product
50		1/22/03	Jeannie Perron			Outside counsel's notes of conference call with USDA personnel in connection with USDA investigation	Work Product
51		1/10/03	Jeannie Perron			Outside counsel's notes of conference call with client in connection with USDA investigation	Attorney-Client
52		8/6/02	Jeannie Perron			Counsel's handwritten notes on draft letter to USDA in connection with USDA investigation. Notes were provided to client.	Attorney-Client; Work Product
53		7/16/02	Jeannie Perron	Julie Strauss		E-mail with outside counsel's redline edits to draft letter to USDA in connection with USDA investigation.	Attorney-Client; Work Product
54		1/10/03	Jeannie Perron	Harris Weinstein		E-mail summarizing conference call between outside counsel and client regarding two USDA investigations	Attorney-Client; Work Product
55		8/9/02	Jeannie Perron			Outside counsel's file memo regarding discussion at law firm of ongoing USDA investigations	Attorney-Client; Work Product
56		7/29/02	Jeannie Perron			Outside counsel's file memo of conversation with client regarding ongoing USDA investigation	Work Product
57		7/26/02	Julie Strauss	William Lindsay	Jeannie Perron; Kayleen Jones	E-mail attaching counsel's comments on draft letter regarding treatment of elephant	Attorney-Client

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
58		7/24/02	Julie Strauss	Harris Weinstein; Jeannie Perron		Hard copy of e-mail proposing edits to draft letter and asking for additional comments from outside counsel; hard copy also contains outside counsel's handwritten summary of phone conversation with in-house counsel	Attorney-Client
59		7/22/02	Jeannie Perron			Outside counsel's notes of phone conversation with client regarding ongoing USDA investigation	Attorney-Client; Work Product
60		7/22/02	Julie Strauss	Jerry Sowalsky; Jeannie Perron; Harris Weinstein; William Lindsay		E-mail attaching letter written by in-house counsel and asking for comments	Attorney-Client
61		7/19/02	Jeannie Perron			Outside counsel's handwritten markup of draft letter	Attorney-Client
62		7/16/02	Jeannie Perron			Outside counsel's proposed edits to letter to be sent by client	Attorney-Client
63		7/22/02	William Lindsay	Julie Strauss	Jeannie Perron	E-mail attaching draft letter and asking for review by in-house and outside counsel in connection with USDA investigation	Attorney-Client; Work Product
64		7/19/02	Julie Strauss	William Lindsay; Jeannie Perron		E-mail attaching draft letter with in-house counsel's comments and questions inserted in connection with USDA investigation	Attorney-Client; Work Product

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
65		7/18/02	Ethan Posner	Jeannie Perron		E-mail chain reflecting discussions among outside counsel about draft letter to be sent by client in connection with USDA investigation	Attorney-Client; Work Product
66		7/15/02	Julie Strauss	Jerry Sowalsky; Harris Weinstein; Jeannie Perron		E-mail attaching draft letter and seeking comment	Attorney-Client
67		7/12/02	Jeannie Perron			Outside counsel's handwritten comments on draft letter to be sent by client	Attorney-Client
68		7/8/02	Jeannie Perron			Outside counsel's notes about conference call with client in connection with USDA investigation	Attorney-Client; Work Product
69		7/21/98	Jeannie Perron			Outside counsel's handwritten notes on draft press release regarding resolution of USDA investigation	Attorney-Client
70		7/21/98	Jeannie Perron	Julie Strauss		Fax with outside counsel's proposed revisions to draft press release regarding resolution of USDA investigation	Attorney-Client
71		Undated	Jeannie Perron			Outside counsel's notes of conversation with client regarding potential USDA investigation	Attorney-Client; Work Product

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
72		5/18/99	Jeannie Perron	Julie Strauss; Harris Weinstein		E-mail from outside counsel providing red-lined comments on draft letter to USDA regarding investigation	Attorney-Client; Work Product
73		5/14/99	Julie Strauss			Draft letter to USDA regarding investigation; sent to outside counsel for review	Attorney-Client; Work Product
74		6/28/99	Jeannie Perron	Julie Strauss	Harris Weinstein	Outside counsel's comments on draft press release regarding allegations made against client	Attorney-Client
75		4/7/99	Harris Weinstein			Outside counsel's handwritten comments on draft press release regarding allegations made against client	Attorney-Client
76		8/23/99	Jeannie Perron			Outside counsel's handwritten notes of telephonic witness interview done in connection with USDA investigation	Work Product
77		8/19/99	Jeannie Perron			Outside counsel's handwritten notes about conversation with potential expert witnesses in connection with USDA investigation	Work Product
78		Undated	Jeannie Perron			Outside counsel's handwritten notes about conversation with potential expert witnesses in connection with USDA investigation	Work Product

Control Number	Bates Number	Date	Author/Creator	Addressees	Other Recipients	Description	Privilege Claimed
79		8/11/99	Jeannie Perron			Outside counsel's handwritten notes about conversation with potential expert witnesses in connection with USDA investigation	Work Product
80		Undated	Jeannie Perron			Outside counsel's handwritten notes about witness interview done in connection with USDA investigation	Work Product
81		Undated	Jeannie Perron			Outside counsel's handwritten notes of witness interviews done in connection with USDA investigation	Work Product
82		Undated	Jeannie Perron			Outside counsel's handwritten notes of witness interview done in connection with USDA investigation	Work Product
83		Undated	Jeannie Perron			Outside counsel's handwritten notes of witness interview done in connection with USDA investigation	Work Product
84		Undated	Jeannie Perron			Outside counsel's handwritten notes about witness interview done in connection with USDA investigation	Work Product
85		Undated	Jeannie Perron			Outside counsel's handwritten notes of meeting with USDA investigators	Work Product