

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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

Plaintiffs,

v.

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

Defendants.

Case No. 03-2006 (EGS/JMF)

**MOTION TO COMPEL DISCOVERY
FROM THE ORGANIZATIONAL PLAINTIFFS AND API**

EXHIBIT LIST

<u>Number</u>	<u>Description</u>
1.	Defendants' First Set of Document Requests to Organizational Plaintiffs (3/30/04) ("Document Requests")
2.	Defendants' First Set of Interrogatories to Organizational Plaintiffs (3/30/04) ("Interrogatories")
3.	Plaintiffs ASPCA, FFA, and AWI's Responses and Objections to Defendants' First Set of Document Production Requests (6/9/04) ("Document Response")
4.	Meyer letter to Gasper (1/16/07)
5.	Plaintiffs' Original Privilege Log (6/9/04)
6.	ASPCA's Responses and Objections to Defendants' First Set of Interrogatories (6/9/04) ("ASPCA's First Response")
7.	AWI's Responses and Objections to Defendants' First Set of Interrogatories (6/9/04) ("AWI's First Response")
8.	FFA's Responses and Objections to Defendants' First Set of Interrogatories (6/9/04) ("FFA's First Response")

9. ASPCA's First Response, Inter. No. 19; AWI's First Response, Inter. No. 19; FFA's First Response, Inter. No. 19
10. ASPCA's First Response, Inter. No. 16; AWI's First Response, Inter. No. 16; FFA's First Response, Inter. No. 16
11. ASPCA's First Response, Inter. Nos. 21, 22; AWI's First Response, Inter. Nos. 21, 22; FFA's First Response, Inter. Nos. 21, 22
12. Notice of Deposition of AWI
13. Deposition of AWI (5/18/05) ("AWI Depo.")
14. Invitation to Fundraiser
15. Deposition of ASPCA (7/19/05) ("ASPCA Depo.")
16. Compare ASPCA Depo. at 80-81, 89 with ASPCA's First Response, Inter. No. 19; AWI's First Response, Inter. No. 19; FFA's First Response, Inter. No. 19.
17. Compare ASPCA Depo. at 46-47 with ASPCA's First Response, Inter. No. 21-22; compare AWI Depo. at 138-39 with AWI's First Response, Inter. No. 21-22; compare FFA Depo. at 157-58 with FFA's First Response, Inter. No. 21-22.
18. Compare ASPCA Depo. at 166 with ASPCA's First Response, Inter. No. 16.
19. Compare FFA Depo. at 166-171 with FFA's First Response, Inter. Nos. 16, 19.
20. Compare AWI Depo. at 143 with AWI's First Response, Inter. No. 16.
21. Compare ASPCA Depo. at 88-89 with ASPCA's First Response, Inter. No. 19.
22. Responsive Documents Produced by WAP in March/April 2007
23. AWI Documents Produced by WAP
24. Gasper letter to Meyer (11/22/06)
25. Meyer letter to Gasper (12/15/06)
26. Gasper letter to Meyer (12/22/06)

27. ASPCA's Supplemental Responses and Objections to Defendants' First Set of Interrogatories (1/31/07) ("ASPCA's Supp. Response")
28. AWI's Supplemental Responses and Objections to Defendants' First Set of Interrogatories (1/31/07) ("AWI's Supp. Response")
29. FFA's Supplemental Responses and Objections to Defendants' First Set of Interrogatories (1/31/07) ("FFA's Supp. Response")
30. Gasper letter to Meyer (1/19/07)
31. Gasper letter to Meyer (2/2/07)
32. Meyer letter to Joiner (2/8/07)
33. Joiner letter to Meyer (2/8/07)
34. Sanerib letter to Joiner (2/14/07)
35. Joiner letter to Sanerib (3/6/07)
36. Sanerib letter to Gasper (12/8/06)
37. API's Response to Interrogatories (1/16/07) ("API's Response")
38. Compare ASPCA's Supp. Response, Inter. Nos. 21 and 22 with ASPCA Depo. at 46-47; compare AWI's Supp. Response, Inter. Nos. 21 and 22 with AWI Depo. at 138-39 and IRS Form of AWI; compare FFA's Supp. Response, Inter. Nos. 21 and 22 with FFA Depo. at 157-58.
39. Compare ASPCA's First Response, Inter. Nos. 16 and 19 with ASPCA's Supp. Response, Inter. Nos. 16 and 19.
40. AWI Documents Originally Withheld
41. Plaintiffs' Press Releases
42. Compare ASPCA Depo. at 89 with ASPCA's Supp. Response, Inter. No. 19.
43. WAP Ledger Reflecting AWI Payments From Fundraiser
44. Compare ASPCA Depo. at 166 with ASPCA's First Response, Inter. No. 16; compare AWI Depo. at 142-43 with AWI's First Response, Inter. No. 16.

45. Compare AWI's First Response, Inter. No. 16 with AWI Depo. at 134-36; compare FFA First Response, Inter. No. 16 with FFA Depo. at 165-66.
46. Organizational Plaintiffs' Supplemental Privilege Log
47. Deposition of Tom Rider at 148-49
48. Compare AWI's IRS Form 990 at 15 with AWI's Supp. Response, Inter. Nos. 21-22.
49. AWI Depo. at 140; AWI's IRS Form 990 at 15; FFA Depo. at 157-58
50. Compare FFA's Supp. Response, Inter. Nos. 21 and 22 with FFA Depo. at 157-58.
51. Compare WAP Ledgers with AWI's Purported Documents Reflecting All Such Contributions
52. Ockene letter to Wolson (2/13/06)
53. Compare ASPCA's First Response, Inter. No. 13 with ASPCA's Supp. Response, Inter. No. 13.