

PLAINTIFFS' EXHIBIT 2
To Plaintiffs' Motion Under Rule 11
Against Defendants And Their Counsel
Civ. No. 03-2006 (EGS/JMF)

FULBRIGHT & JAWORSKI L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP
801 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-2623
WWW.FULBRIGHT.COM

JOHN M. SIMPSON
PARTNER
JSIMPSON@FULBRIGHT.COM

DIRECT DIAL: (202) 662-4539
TELEPHONE: (202) 662-0200
FACSIMILE: (202) 662-4643

April 30, 2007

BY PDF TRANSMISSION

Katherine A. Meyer
Meyer Glitzenstein & Crystal
1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 2009-1056

Re: ASPCA, et al. v. Feld Entertainment, Inc., No. 03-2006 EGS (D.D.C.)

Dear Ms. Meyer:

This letter is submitted on behalf of Feld Entertainment, Inc. ("FEI") defendant in the above captioned case.

It has come to our attention that one or more of the plaintiffs in the above-captioned case are using documents produced by FEI in discovery in this case in order to seek publicity and to argue the merits of plaintiffs' claims against FEI in the media. For example, a press release in the "Press Room" section of the website for the American Society for the Prevention of Cruelty to Animals dated March 21, 2007, makes specific reference to this lawsuit and to the contents of a document produced by FEI in this lawsuit which, according to this press release, "shed new light" on what plaintiffs contend in the litigation is the "inhumane treatment" of FEI's elephants. Our understanding is that Tom Rider has also made statements to the press about the same discovery document.

As you will recall, Judge Sullivan entered an order in this case on September 26, 2005, specifically admonishing plaintiffs as follows:

Plaintiffs are admonished, however, that the purpose of discovery is to produce and seek evidence for use *in litigation* and the Court will not take lightly any abuse of the discovery process for purposes of publicity or to argue the merits of plaintiffs' claims in the media, as opposed to the Court.

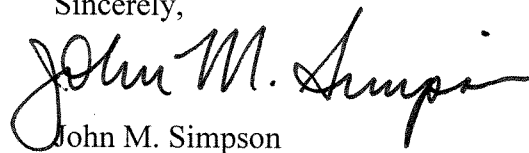
Order at 2 (Sept. 26, 2005). A copy of the Court's order is attached hereto for your reference.

Katherine A. Meyer
April 30, 2007
Page 2

The activities of ASPCA and Mr. Rider described above are directly contrary to Judge Sullivan's order. That is, they are clearly actions based on discovery material that were taken to obtain publicity and to argue the merits of plaintiffs' claims in the media.

Accordingly, FEI hereby demands that plaintiffs immediately cease and desist their violation of Judge Sullivan's September 26, 2005 order.

Sincerely,



John M. Simpson

JMS/jms

Attachment