

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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AMERICAN SOCIETY FOR THE	)	
PREVENTION OF CRUELTY TO	)	
ANIMALS, <u>et al.</u> ,	)	
	)	Civ. No. 03-2006 (EGS)
Plaintiffs,	)	
	)	
v.	)	
	)	
RINGLING BROS. AND BARNUM	)	
& BAILEY CIRCUS, <u>et al.</u> ,	)	
	)	
Defendants.	)	
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**PLAINTIFFS’ MOTION TO COMPEL DEFENDANTS’  
COMPLIANCE WITH PLAINTIFFS’ DISCOVERY REQUESTS  
AND RULE 37(a)(2)(A) CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 37(a)(2), plaintiffs move for an order compelling defendants to comply with plaintiffs’ discovery requests, which were served on defendants on March 30, 2004, in compliance with Federal Rules of Civil Procedure 26, 33, 34, and 36. In support of this motion, plaintiffs submit the accompanying Memorandum in Support of Plaintiffs’ Motion to Compel Defendants’ Compliance with Plaintiffs’ Discovery Requests, Exhibits A-S, and a proposed order.

Pursuant to Federal Rule of Civil Procedure 37(a)(2)(A), counsel for plaintiffs also hereby certify that they have conferred with counsel for defendants in good faith, in an effort to secure the release of the requested information without court action. These efforts are also chronicled in Exhibits D-L to the accompanying Memorandum.

Respectfully submitted,

/s/

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January 25, 2005

Counsel for Plaintiffs