

FILED UNDER SEAL

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF FAIRFAX

| | |
|-------------------------------|---|
| PEOPLE FOR THE ETHICAL |) |
| TREATMENT OF ANIMALS, INC., |) |
| |) |
| Plaintiff, |) |
| |) |
| v. |) |
| |) |
| KENNETH FELD, <i>et al.</i> , |) |
| |) |
| Defendants. |) |

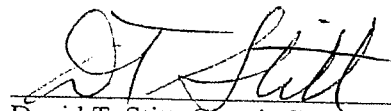
AT LAW NO. 204452

ORDER

THIS MATTER CAME BEFORE THE COURT on February 20, 2004, upon Plaintiff's Motion to Compel Defendant Charles F. Smith to respond to requests for production of documents served upon him. Upon review of the briefs filed, the argument of counsel, and it otherwise being proper to do so, it is by the Court:

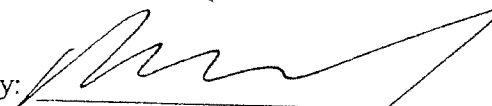
ORDERED that the motion to compel is granted as narrowed by the plaintiff's subpoenas to Sells Floto and Feld Entertainment and as granted pursuant to the court's ruling on 12/19/03; that Smith shall produce responsive documents, if any, only after production by Sells Floto and Feld Entertainment, Inc, to the extent not already produced by them, 15 days after they make production; this production shall be governed by a protective order similar in scope to that entered as to Sells Floto and Feld Entertainment.

Entered this 20TH day of February 2004.


David T. Stitt, Circuit Court Judge

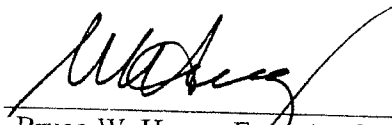
SEEN AND agreed :

HIRSCHKOP & ASSOCIATES, PC
108 North Columbus Street
Alexandria VA 22314

By: 
Philip J. Hirschkop, Esq.
Counsel for Plaintiff

SEEN AND _____ :

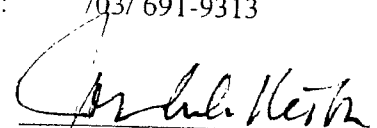
HENRY, HENRY, O'DONNELL & DAHNE⁵, P.C.
4103 Chain Bridge Road, Suite 100
Fairfax VA 22030

By: 
Bruce W. Henry, Esq. VSB #23951
Counsel for Defendant Charles F. Smith

SEEN AND objected to :

Joseph T. Small, Jr., Esq.
John M. Simpson, Esq.
Lisa Zeiler Joiner, Esq.
FULBRIGHT & JAWORSKI LLP
801 Pennsylvania Ave., N.W.
Washington, D.C. 20004

BLANKINGSHIP & KEITH, P.C.
4020 University Drive, Suite 300
Fairfax, Virginia 22030
Phone: 703/ 691-1235
Fax: 703/ 691-9313

By: 
John A. C. Keith, VSB No. 14116
William B. Porter, VSB No. 41798
Counsel for Non-Party Movants
Feld Entertainment, Inc. and Sells-Floto, Inc.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF FAIRFAX

PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC.,)
))
Plaintiff,)
))
v.)
))
KENNETH FELD,)
))
and)
))
JOHN DOES 1, 2, AND 3,)
))
Defendants.)

At Law No. 220181

ORDER

THIS MATTER CAME BEFORE THE COURT on September 24, 2004, upon Defendant Kenneth Feld's Motion for a Protective Order. Upon consideration of briefs and the arguments of counsel, and it otherwise being proper to do so, it is by the Court:


ORDERED that the Motion is sustained as to personnel records,
federal and state tax returns and any animal rights organizations
except PAWS and ~~State~~ ^{Elephant} Alliance with out prejudice to renew if PETC makes a
showing of relevance. All other issues raised in the Motion are taken
under advisement and Mr. Feld has no obligation to respond until further
order of the Court.

ENTERED this 24th day of September 2004.


Dennis J. Smith, Circuit Court Judge

SEEN AND _____:

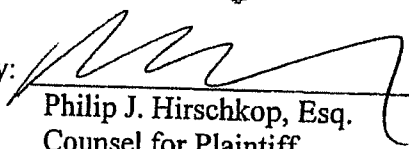
BLANKINGSHIP & KEITH, P.C.
4020 University Drive, Suite 300
Fairfax, Virginia 22030
703/ 691-1235 (phone)
703/ 691-3913 (facsimile)

By: 

John A. C. Keith, VSB No. 14116
William B. Porter, VSB No. 41798
Counsel for Defendant Kenneth Feld

SEEN AND objected to for reasons stated on the record

HIRSCHKOP & ASSOCIATES, PC
108 North Columbus Street
Alexandria VA 22314

By: 

Philip J. Hirschkop, Esq.
Counsel for Plaintiff

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

PEOPLE FOR THE ETHICAL TREATMENT :
OF ANIMALS, :

Plaintiff :

v. :

AT LAW NO. 220181

KENNETH FELD, *et al.*, :

Defendants :

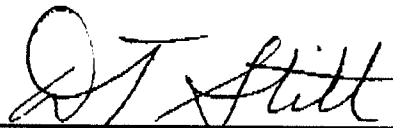
ORDER

THIS MATTER came before the Court on January 12, 2005 upon Plaintiff's Motion To Compel Responses To Plaintiff's First Set Of Interrogatories, and the Court having reviewed and considered the pleadings and argument of counsel, and for the reasons stated on the record, it is hereby

ADJUDGED, ORDERED AND DECREED as follows:

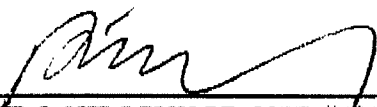
Plaintiff's Motion To Compel Responses To Plaintiff's First Set Of Interrogatories is GRANTED IN PART AND DENIED IN PART. Within twenty-one (21) days from the date of this Order, defendant Feld shall provide more complete responses to Interrogatory Numbers 1-12, 14-20, and 22, as stated on the record at the hearing. As to all responses, defendant Feld is ordered to make reasonable inquiry and state that he has done so. As to Interrogatory Numbers 11 and 14, the supplemental answers are limited to PeTA, PAWS and The Elephant Alliance. The Court will revisit Interrogatory Number 21 pending briefing on Plaintiff's Motion To Compel Production Of Documents as set forth on the record.

ENTERED this 24th day of January, 2005.



David T. Stitt, Judge

SEEN AND agreed _____:




PHILIP J. HIRSCHKOP, VSB #4929
HIRSCHKOP & ASSOCIATES, P.C.
108 North Columbus Street
Alexandria, Virginia 22314
(703) 836-6595 / (703) 548-3202 (fax)

BERNARD J. DiMURO, VSB #18784
MICHAEL BARNSBACK, VSB #19177
DiMURO, GINSBURG & MOOK, P.C.
908 King Street, Suite 200
Alexandria, Virginia 22314
(703) 684-4333 / (703) 548-3181 (fax)

Counsel for Plaintiff

SEEN AND objected to _____:



JOHN A.C. KEITH, VSB #14116
WILLIAM B. PORTER, VSB #41798
BLANKINGSHIP & KEITH, P.C.
4020 University Drive, Suite 300
Fairfax, Virginia 22030
(703) 691-1235 / (703) 691-3913 (fax)

GEORGE A. BORDEN
JOSEPH PETROSINELLI
WILLIAMS & CONNOLLY, LLP
725 - 12th Street, N.W.
Washington, D.C. 20005

Counsel for Defendant Feld

(703) 691-1235 / (703) 691-3913 (fax)

GEORGE A. BORDEN
JOSEPH PETROSINELLI
WILLIAMS & CONNOLLY, LLP
725 - 12th Street, N.W.
Washington, D.C. 20005

Counsel for Defendant Feld