## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs

v. : CIV. NO. 03-2006 (EGS/JMF)

RINGLING BROTHERS AND BARNUM & BAILEY CIRCUS, et al,

Defendants

EXHIBIT 1 TO

NON-PARTY PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS'
REPLY TO PLAINTIFF'S MOTION TO COMPEL COMPLIANCE

WITH THIRD PARTY SUBPOENA

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January 25, 2008

## VIA E-MAIL & REGULAR MAIL

Katherine A. Meyer Meyer Glitzenstein & Crystal 1601 Connecticut Ave., N.W., Ste. 700 Washington, D.C. 20009

Re:

ASPCA, et al. v. Feld Entertainment, Inc., Civ. Action No. 1:03-cv-2006; Plaintiffs' Subpoenae to PETA

Dear Ms. Meyer:

On behalf of Feld Entertainment, Inc. ("FEI"), I am writing to put both you and Mr. Hirschkop on notice that FEI objects to the two subpoenae that plaintiffs purportedly served yesterday and Wednesday on PETA for deposition transcripts. FEI's objections are contained in the attached Notice. Pursuant to Paragraph 5 of the protective orders entered by the Court in Fairfax, you are both hereby advised the FEI objects to the production of all transcripts that it produced, provided and/or designated in the PETA v. Feld cases. Consequently, no production can occur until the relevant parties agree or a court determines otherwise pursuant to those protective orders. Please advise whether plaintiffs will withdraw the subpoenae voluntarily, or whether it will be necessary to file a motion to quash in this case.

Sincerely

Lisa Zeiler Joiner

CC:

Philip Hirschkop (via facsimile) Matthew Andelman (via facsimile) William Porter (via facsimile)