

PaulHastings

Paul, Hastings, Janofsky & Walker LLP
875 15th Street, N.W.
Washington, DC 20005
telephone 202-551-1700 • facsimile 202-551-1705 • www.paulhastings.com

Atlanta
Beijing
Brussels
Chicago
Hong Kong
London
Los Angeles
Milan
New York
Orange Country
Palo Alto
Paris
San Diego
San Francisco
Shanghai
Tokyo
Washington, DC

(202) 551-1771
matthewstowe@paulhastings.com

December 17, 2007

VIA E-MAIL AND FIRST CLASS MAIL

George Andrew Gasper
Fulbright & Jaworski L.L.P.
Market Square
801 Pennsylvania Avenue, N.W.
Washington, DC 20004-2623

Re: Humane Society

Dear George:

The use of the phrase "custody or control" in my letter of December 13, 2007, was not intended to limit HSUS's production to something other than that order by the Court. With respect to points 1-4 appearing on page two of that same letter, HSUS further confirms that it does not have in its possession, custody or control any documents falling within those categories. In other words, HSUS has produced all documents responsive to the order to compel issued by the Court on December 3, 2007.

With respect to your specific concern regarding e-mails and other documents relating to payments made by HSUS to the WAP, I have doubled checked with the client today, and there are none responsive to the Court's order. The reason is that, with the exception of the early payments relating to the manatees, these were check requests issued by the FFA that were simply processed through the HSUS accounting department following the 2004 corporate combination of the two entities. It is not surprising, then, that there was no e-mail traffic generated at HSUS by these requests.

Please call me at 202-551-1771 if you have any questions.

Sincerely,



Matthew F. Stowe
for Paul, Hastings, Janofsky & Walker LLP