

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,

v.

FELD ENTERTAINMENT, INC.,

Defendant.

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Case No. 03-2006 (EGS/JMF)

**FELD ENTERTAINMENT, INC.'S OBJECTIONS TO
PLAINTIFFS' AMENDED PRE-TRIAL STATEMENT**

EXHIBIT 4

**DEFENDANT FELD ENTERTAINMENT, INC.'S OBJECTIONS TO
PLAINTIFFS' WILL CALL EXHIBIT "2B"**

JEWELL

DOCUMENT	OBJECTION
FEI 2707	No Objection.
FEI 39550	No Objection.
FEI 49026	No Objection.
FELD 0001234-235	Incomplete (FOIA Redactions; unredacted version, PL 014244-245, is included in Nicole file, Pls. Will Call Ex. 2B). F.R.E. 106 Relevance as to non-Rider Blue and CBW Elephants. F.R.E. 401, 402 Duplicative (included in Mysore, Susan and Nicole files, Pls. Will Call Ex. 2B). F.R.E. 402
FELD 0001374-375	No Objection.
API 1007-009	Duplicative (Pls. Will Call 54). F.R.E. 402 Same Objections as to Pls. Will Call 54.
FELD 0023800	Irrelevant and Immaterial (TB; CBW; non-FEI). F.R.E. 401, 402 Duplicative (included in Karen, Mysore and Zina files, Pls. Will Call Ex. 2B). F.R.E. 402
FELD 0000688-691	Duplicative (Pls. Will Call Ex. 3; included in Lutzi and Zina files, Pls. Ex. Will Ex. 2B). F.R.E. 402 Same Objections as to Pls. Will Call Ex. 3.

KAREN

DOCUMENT	OBJECTION
FELD 0001376-1379	Incomplete (FOIA Redaction). F.R.E. 106
FELD 0023800	Irrelevant and Immaterial (TB; CBW and non FEI elephants). F.R.E. 401, 402 Duplicative (included in Jewell, Mysore and Zina files, Pls. Will Call 2B). F.R.E. 402

LUTZI

DOCUMENT	OBJECTION
FELD 0000688-691	Duplicative (Pls. Will Call Ex. 3; included in Jewell and Zina files, 2B). F.R.E. 402 Same Objections as to Pls. Will Call Ex. 3
AWI 06673	Incomplete (FOIA Redaction). F.R.E. 106 Irrelevant (non-Rider elephant; injuries as to human handler, not elephant). F.R.E. 401, 402

MYSORE

DOCUMENT	OBJECTION
FELD 0023800	Irrelevant and Immaterial (TB; CBW and non-FEI elephants). F.R.E. 401, 402 Duplicative (included in Jewell and Karen files, Pls. Will Call 2B). F.R.E. 402
FELD 0001086	Irrelevant (as to CBW, non-Rider blue elephants and other animals). F.R.E. 401, 402
FELD 0001234-235	Incomplete (FOIA Redactions; unredacted version, PL 014244-245, is included in Nicole file, Pls. Will Call Ex. 2B). F.R.E. 106 Relevance (as to non-Rider blue and CBW Elephants). F.R.E. 401, 402 Duplicative (included in Jewell, Mysore and Nicole files, Pls. Will Call Ex. 2B). F.R.E. 402
FELD 0001380-081	No objection.
PL 013715	No objection.

SUSAN

DOCUMENT	OBJECTION
FEI 0635	No objection.
FEI 37628	No objection.
PL 10483-084	Incomplete (FOIA Redactions; unredacted version, PL 014244-245, is included in Nicole files, Pls. Will Call Ex. 2B). F.R.E. 106 Relevance (as to non-Rider Blue and CBW elephants). F.R.E. 401, 402 Duplicative (included in Jewell, Mysore and Nicole files, Pls. Will Call Ex. 2B). F.R.E. 402

ZINA

DOCUMENT	OBJECTIONS
FEI 39957	No objection.
FELD 0023800	Irrelevant and Immaterial (TB; CBW; non-FEI elephants). F.R.E. 401, 402 Duplicative (included in Karen and Mysore files, Pls. Will Call Ex. 2B). F.R.E. 402
FELD 000688-691	Duplicative (Pls. Will Call Ex. 3; included in Jewell and Lutzi files, Pls. Will Call Ex. 2B). Same Objections as to Pls. Will Call Ex. 3.
PL 013618-319	Irrelevant (as to non-Rider and CBW elephants). F.R.E. 401, 402

NICOLE

DOCUMENT	OBJECTION
PL 014244-245	Duplicative (included in Jewell, Mysore and Susan files, Pls. Will Call Ex. 2B) (This document is a complete version of FELD 001234-235 & PL 10483-484). F.R.E. 402 Relevance (as to non-Rider blue and CBW elephants). F.R.E. 401, 402
PL 11091-192	Duplicative (Pls. Will Call 12). F.R.E. 402 Same Objections as to Pls Will Call 12.
PL 01405	Irrelevant and Immaterial (TB). F.R.E. 401, 402 Incomplete (FOIA Redactions). F.R.E. 106 Hearsay. F.R.E. 801, 802 Hearsay Within Hearsay. F.R.E. 801, 802, 805
PL 01407	Irrelevant. F.R.E. 401, 402
PL 01412-413	Irrelevant and Immaterial (TB). F.R.E. 401, 402 Incomplete (FOIA Redactions). F.R.E. 106 Hearsay. F.R.E. 801, 802 Hearsay Within Hearsay. F.R.E. 801, 802, 805
FELD 001335	Duplicative (Pls. Will Call Ex. 11). F.R.E. 402 Same objections as Pls. Will Call Ex. 11.
FELD 0001292	Duplicative (Pls. Will Call Ex. 109). F.R.E. 402 Same objections as to Pls. Will Call Ex. 109.
PL 012562	Irrelevant and Immaterial (TB). F.R.E. 401, 402 Incomplete. F.R.E. 106