

Plaintiffs' Opposition to
Defendant's Motion to Strike
Plaintiffs' Amended Pre-Trial Statement

Exhibit 3

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October 12, 2007

Via Hand Delivery

Lisa Zeiler Joiner
Fullbright & Jaworski
Market Square
801 Pennsylvania Avenue N.W.
Washington, D.C. 20004-2623

Re: ASPCA et al. v. Ringling Brothers, et al., Civ. No. 03-2006 (EGS)

Dear Ms. Joiner:

Pursuant to Judge Facciola's September 25, 2007 Order, enclosed are: (1) a list of the names of plaintiffs' expert witnesses (Attachment A); (2) a detailed description of the procedures that plaintiffs' experts wish to perform during the inspections and the purpose for such procedures (Attachment B); and copies of plaintiffs' experts' Curriculum Vitae (Attachment C). One of plaintiffs' experts, Ajay A. Desai, is currently conducting field research and is unreachable, so we will provide you with a copy of his Curriculum Vitae upon his return, which should be the middle of next week.

Sincerely,


Tanya Sanerib



October 12, 2007 Letter
ASPCA v. Ringling Brothers
Attachment A

Plaintiffs List of Expert Witnesses in ASPCA v. Ringling Brothers¹

Carol Buckley
Executive Director
The Elephant Sanctuary

Ros Clubb, PhD
Scientific Officer
Royal Society for the Prevention of Cruelty to Animals

Ajay Desai, Masters
Co-Chair
IUCN Asian Elephant Specialist Group

Philip K. Ensley, DVM
Diplomat, American College of Zoological Medicine
former Associate Veterinary
San Diego Wild Animal Park

Benjamin Hart, DVM, PhD
Diplomat, American College of Veterinary Behaviorists
Professor
University of California at Davis

Lynette Hart, PhD
Professor
University of California at Davis

Colleen Kinzley
General Curator
Oakland Zoo

Joyce Poole, PhD
Research Director
Amboseli Elephant Research Project, Amboseli Trust for Elephants

Gail Laule
Principal, Director of Animal Behavior
Active Environments, Inc.

¹ This list does not include any potential rebuttal expert witnesses whom plaintiffs may call.