

**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)

**JOINT STATUS REPORT REGARDING DEFENDANT
FELD ENTERTAINMENT, INC.’S REQUEST FOR ATTORNEYS FEES**

Pursuant to the Court’s January 12, 2010 Order, the parties hereby submit this Joint Status Report Regarding Defendant Feld Entertainment, Inc.’s Request for Attorneys Fees. On January 12, 2010, the Court ordered the parties to confer, pursuant to LCvR 54.2(a), to attempt to reach an agreement on Defendant’s request for attorneys fees. The parties since have exchanged correspondence and conferred in person about Defendant’s claim for attorneys fees (which, through December 31, 2009, totals approximately \$19 million in attorney and expert fees) and hereby address LCvR 54.2 (a)(1)-(4):

- (1) No resolution of any aspect of the fee matter has been reached.
- (2) As no resolution has been reached, no judgment for any fee should be entered at this time.
- (3) With respect to the determination of attorneys fees pending appeal, Defendant’s position is that Plaintiffs’ liability for attorneys fees incurred in the District Court should not be postponed pending the outcome of the current cross appeals that have been filed by the parties.

Plaintiffs' position is that Defendant's request for attorneys fees should be stayed pending the outcome of those appeals.

(4) If the matter is not stayed, the parties hereby request the following briefing schedule with respect to completion of the fee litigation:

(a) Defendant requests that it have to and until May 25, 2010, to file its Motion for Attorneys Fees.

(b) Plaintiffs request that they have to and until July 30, 2010, in which to file a response.

(c) Defendant requests that it have to and until August 30, 2010, in which to file a reply to Plaintiffs' response.

Dated this 18th day of March, 2010.

Respectfully submitted,

/s/ Katherine A. Meyer
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