

EXHIBIT L

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN SOCIETY FOR THE)	
PREVENTION OF CRUELTY)	
TO ANIMALS, et al.,)	
)	
Plaintiffs,)	
v.)	Case No.: 03-2006 (EGS/JMF)
FELD ENTERTAINMENT, INC.,)	
)	
Defendant.)	

**DECLARATION OF STEPHEN A. SALTZBURG IN OPPOSITION TO
DEFENDANT’S MOTION FOR ENTITLEMENT TO ATTORNEYS’ FEES**

I, Stephen A. Saltzburg, hereby declare, under penalty of perjury, that the following facts are true to the best of my knowledge and belief:

I. Limited Role

1. I had no role whatsoever in the initiation of the lawsuit; the filing of pleadings or motions or other papers; drafting or serving, or responding to, discovery requests; choosing, preparing or interviewing witnesses for depositions or trial; briefing as to legal or factual contentions; reviewing filings; or any other substantive aspect of the case. I agreed to consult with plaintiffs’ counsel to assist them in complying with the Federal Rules of Evidence in certain limited respects and in providing some guidance as to basic trial advocacy skills.

2. To the best of my knowledge, I had never seen the documents accompanying the defendant’s motion for attorneys’ fees until the motion was filed and served upon me.

3. My best estimate is that I provided a total of 5 to 10 hours of advice to plaintiffs’ counsel and that advice had nothing whatever to do with the complaints raised by the defendant in its motion.

4. I spent considerable more time reading the motion and accompanying documents than I devoted to the limited consulting I provided to plaintiffs' counsel.

II. Defendant's Awareness of as to My Limited Role

5. Defendant and its counsel are fully aware of the following facts:

- a. They never spoke to me during the litigation.
- b. They never communicated with me in any manner during the litigation.
- c. I never attended a deposition or appeared in any proceeding or even in any informal discussions with defendant or its counsel.
- d. I filed no documents in the case.

III. Lack of Knowledge with Respect to Defendant's Claims

6. Because of the limited role I played in consulting with plaintiffs' counsel, I lack personal knowledge of the various allegations made by defendant. I understand that plaintiffs' counsel will file a reply on the merits. Because I was not involved in the investigation, initiation, preparation, trial, briefing, interviewing or any other aspect of preparing the case, I lack personal knowledge as to the allegations made by the defendant and will presumably lack personal knowledge as to the claims that will be made in response by plaintiffs' counsel. I believe that plaintiffs' counsel will confirm in its filing the limited role that I played as stated in this Declaration.

IV. Lack of Any Good Faith Effort by Defendant to Explore My Role

7. Defendant and its counsel made no effort to contact me prior to making the motion for attorneys' fees to inquire as to what role I played in the litigation and to determine whether there is a factual or legal basis to hold me responsible for any of the conduct of which defendant complains.

8. On April 19, 2012, I sent an e-mail to Kara Petteway, one of the counsel for defendant. At the time I contemplated moving for permission to file a separate opposition to the motion, an option I later decided not to pursue. However, in my e-mail, I included the following sentence: “My activity advising plaintiffs counsel was limited to 5-10 hours, and I plan to file a separate opposition.” Although Ms. Petteway ultimately indicated that the defendant would not oppose a separate motion by me, the defendant chose not to pursue any inquiry whatsoever into the limited nature of the work that I did for the plaintiffs’ counsel in this case.

DATE: June 6, 2012

/s Stephen A. Saltzburg
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