IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

ANIMAL WELFARE INSTITUTE, et al.,)
Plaintiffs,)
v.) Case No. 1:03-cv-2006) (EGS/JMF)
FELD ENTERTAINMENT, INC.,) (EGS/3NIF)
Defendant.)
)

PLAINTIFFS' MOTION FOR LEAVE TO TAKE LIMITED DISCOVERY

In accordance with the Court's July 17, 2013 Order, Plaintiffs Animal Welfare Institute, The Fund for Animals, Inc., and Born Free USA (collectively, "Plaintiffs"), by and through their undersigned counsel, respectfully submit this Motion for Leave to Take Limited Discovery. The grounds for this Motion are set forth in the accompanying Memorandum of Points and Authorities that is submitted herewith.

In accordance with Local Rule 7(m), counsel for Plaintiffs have met and conferred in good faith with counsel for Defendant Feld Entertainment, Inc. ("Feld") in an effort to resolve the issues presented by this Motion. Regrettably, counsel were not able to resolve all the issues and Feld opposes this Motion. However, Feld is still considering whether it will produce retainer agreements and any amendments thereto.

WHEREFORE, Plaintiffs respectfully request that the Court grant the limited discovery requested in this Motion that is needed to test the reasonableness of Feld's unprecedented Fee Petition. A proposed Order is attached.

Date: November 26, 2013 Respectfully submitted,
ANIMAL WELFARE INSTITUTE

By Counsel

/<u>s</u>/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 26th of November, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

	/s/
Stephen L. Neal, Jr.	