

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

<hr/>	)	
<b>ANIMAL WELFARE INSTITUTE, <u>et al.</u>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 03-2006 (EGS/JMF)</b>
	)	
<b>FELD ENTERTAINMENT, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	
<hr/>	)	

**DEFENDANT FELD ENTERTAINMENT, INC.’S OPPOSITION TO PLAINTIFFS’  
MOTION FOR LEAVE TO TAKE “LIMITED” DISCOVERY**

**EXHIBIT 2**

**(Opp. Ex. 2)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANIMAL WELFARE INSTITUTE, et al., )

Plaintiffs, )

v. )

Civil Action No. 03-2006 (EGS/JMF)

FELD ENTERTAINMENT, INC., )

Defendant. )

**DECLARATION OF EUGENE D. GULLAND IN SUPPORT OF  
DEFENDANT FELD ENTERTAINMENT, INC.’S OPPOSITION TO  
PLAINTIFFS’ MOTION FOR LEAVE TO TAKE LIMITED DISCOVERY**

1. My name is Eugene D. Gulland. I am more than twenty-one (21) years of age and am competent to make this declaration. I have personal knowledge of the facts stated in this declaration.

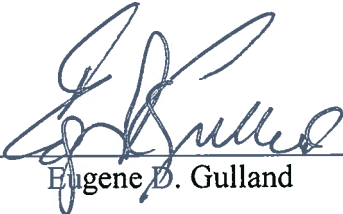
2. I am a senior counsel at the law firm of Covington & Burling LLP (“Covington”). During the time that Covington represented defendant Feld Entertainment, Inc. (“FEI”) in the above-captioned matter and the predecessor matter, Civil Action No. 00-1641-EGS (D.D.C.) (collectively the “ESA Case”), from July of 2000 to through March 13, 2006, I was Covington’s partner in charge of the litigation for FEI and lead counsel of record for FEI in the ESA Case.

3. Our files contain no written retainer agreement between FEI and Covington for the ESA Case, nor do I recall one. I remember being advised that FEI was an existing firm client at the time that Covington took on the representation of FEI in the ESA Case, and it was not Covington’s general practice to enter a new engagement letter for a new matter when there was already an established relationship with a client. The understanding between Covington and FEI

about the legal fees in the ESA Case is stated in paragraphs 48-50 and 57 of my Declaration (ECF No. 655).

4. I have no recollection or knowledge of any complaints by FEI concerning the rates charged, hours spent, or overall fees and disbursements charged by Covington on the ESA Case.

5. I declare under penalty of perjury that the foregoing is true and correct. Executed on December 12, 2013.

  
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Eugene D. Gulland