

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

ANIMAL WELFARE INSTITUTE, et al.,)

Plaintiffs,)

v.)

FELD ENTERTAINMENT, INC.,)

Defendant.)

Case No: 03-2006 (EGS/JMF)

**DEFENDANT FELD ENTERTAINMENT, INC.'S MOTION FOR SUBSTITUTION OF
PLAINTIFF TOM RIDER AND NOTICE OF HEARING**

EXHIBIT 3

Simpson, John

From: Matt Kaiser <mkaiser@tklf.com>
Sent: Monday, November 18, 2013 6:43 PM
To: Simpson, John
Subject: Re: Animal Welfare Institute, et al. v. Feld Entertainment, Inc., No. 03-2006-EGS/JMF (D.D.C.)

Mr. Simpson,

I'm unaware of any obligation to provide any information to you in response to your prior email. That said, I do not know who the administrator, executor, or personal representative of Tom Rider's estate will be. Nor do I know who might receive assets or distributions from his estate.

Matthew G. Kaiser

The Kaiser Law Firm PLLC
1400 I Street NW
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Washington, DC 20005
(202) 640-2850
www.tklf.com

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On Thu, Nov 14, 2013 at 2:40 PM, Simpson, John <john.simpson@nortonrosefulbright.com> wrote:

Mr. Kaiser:

We reiterate our request for you to identify the administrator or executor of Mr. Rider's estate. If neither exists, please identify the person or persons who were the distributee(s) of Mr. Rider's unprobated estate. We request this information so that the proper substitution motion may be submitted under Fed. R. Civ. P. 25(a)(1). We would appreciate a response to this e-mail by close of business tomorrow, Friday, November 15, 2013 by either providing the information, or stating that you do not know it so that we may pursue other alternatives. Thank you.

John M. Simpson | Partner

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From: Simpson, John
Sent: Friday, October 25, 2013 4:48 PM
To: 'mkaiser@thekaiserlawfirm.com'
Subject: Animal Welfare Institute, et al. v. Feld Entertainment, Inc., No. 03-2006-EGS/JMF (D.D.C.)

Mr. Kaiser:

In light of the notification of the passing of Mr. Rider which was filed today in the RICO Case (see attached), we formally request that you take steps to preserve any information that was in Mr. Rider's possession that relates to the above-captioned matter including maintaining access to all data that was under Mr. Rider's control including electronic mail, bank accounts and social media. We also request that you identify the executor or administrator of Mr. Rider's estate or who else may be handling Mr. Rider's affairs so that the proper substitution motion may be submitted under Fed. R. Civ. P. 25(a)(1). Thank you.

John M. Simpson | Partner

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