UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, et al.,

Plaintiffs,

v. : Case No. 1:03-CV-02006 (EGS/JMF)

RINGLING BROS. AND BARNUM & BAILEY CIRCUS, et al.,

Defendants.

DEFENDANT FELD ENTERTAINMENT INC.'S RESPONSE IN OPPOSITION TO PLAINTIFFS' EXPEDITED MOTION TO ENFORCE THE COURT'S SEPTEMBER 26, 2005 ORDER

EXHIBIT J

COVINGTON & BURLING

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February 10, 2006

BY HAND DELIVERY

Kimberly Ockene Meyer & Glitzenstein 1601 Connecticut Ave. N.W., Suite 700 Washington, D.C. 20009

Re:

ASPCA et al. v. Ringling Bros. and Barnum & Bailey Circus et al.,

No. 03-2006 (D.D.C.)

Dear Kim:

Accompanying this letter, please find the following:

- documents that have already been produced to plaintiffs, which we have determined inadvertently redacted information about Asian elephants. Accordingly, we have unredacted any information about Asian elephants, and we are reproducing the documents to you. These documents have bates numbers FELD 0020473-U, FELD 0020480-U, FELD 0020482-U, FELD 0020483-U, FELD 0020487-U, FELD 0020492-U, FELD 0020496-U, FELD 0020500-U, FELD 0020503-U, FELD 0020510-U, FELD 0020514-U, FELD 0020515-U, FELD 0021617-U, FELD 0021687-U, FELD 0021718-U, FELD 0021815-U, FELD 0021959-U, FELD 0021960-U, and FELD 0022671-U;
- 2. Documents bearing bates numbers FELD 027695 FELD 0030212. We are producing these documents as kept in the ordinary course of business. Some of these documents are covered by the protective order and by declarations that have already been submitted to you. A list of those documents is attached. Included in these materials are documents regarding the Mark Gebel trial, documents regarding the Riccardo investigation, and documents relating to recent loans of elephants, among other things;
- 3. A log of documents from which defendant has redacted non-responsive information, along with a description of the information that has been redacted.

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Kimberly Ockene February 10, 2006 Page 2

We expect to provide you with a privilege log for defendant's recent productions within the next week. Please contact me if you have any questions.

Sincerely,

Joshua Wolson

Documents Subject To Protective Order

Riccardo Necropsy (Wiedner Decl. ¶ 7)

FELD 0027819 FELD 0027842

Trunk Wash Documents (Lindsay Decl. ¶ 4)

FELD 0027835 - FELD 0027038

FELD 0027985 - FELD 0028071

FELD 0028040 - FELD 0028082

FELD 0028098 - FELD 0028105

FELD 0029060 - FELD 0029083