UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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

:

Plaintiffs,

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

RINGLING BROS. AND BARNUM &

BAILEY CIRCUS, et al.,

v.

:

Defendants.

Detenuants.

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

EXHIBIT C

September 29, 2005

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:

As noted in Josh Wolson's letter accompanying yesterday's production of medical records, attached are additional documents that are being produced pursuant to the Court's Order dated September 28, 2005, and FRCP 26(e). These documents, which bear bates numbers FELD 0004094 – FELD 0004177 and FELD 0018555 – FELD 0022708, are medical records subject to the terms of the Protective Order entered by the Court on September 28.

We are producing all documents in this production as kept in the ordinary course of business. Please call me if you have any questions.

Sincerely,

Maura A. Dalton