

FULBRIGHT & JAWORSKI L.L.P.

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May 12, 2006

VIA FEDERAL EXPRESS

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

Re: ASPCA v. Feld Entertainment, Inc., Civil Action No. 1:03-cv-2006

Dear Ms. Ockene:

On behalf of Feld Entertainment, Inc., documents numbered FEI 0438 to FEI 3233 (“the Production”) are hereby produced. Documents number FEI 3064-68 are designated Confidential pursuant to the Court’s protective order entered September 26, 2005. The Production is made under full reservation of all rights and objections, including but not limited to, improper use and dissemination of the Production outside of this litigation. We attempted to eliminate from the Production duplicates of any documents previously produced. However, due to the large volume of materials already produced and to satisfy the production date you requested, we may not have been able to identify all duplicates. The Production contains responsive documents identified thus far for the 1994-1995 time period. We have not completed our search and review from that time period and will supplement promptly if necessary. As for any responsive materials from the October 1, 2005 to May 1, 2006 time period, they will be provided in a supplemental production no later than June 16, 2006. We would ask that plaintiffs fulfill their obligation to supplement no later than June 16, 2006 as well.

You had previously inquired regarding audiotapes at Fulbright & Jaworski that you believed were responsive to plaintiffs’ document requests. Although we do not agree that those tapes are either relevant or responsive, the issue is moot: The tapes are beyond the 10-year date range for discovery in this case and are not subject to production.

FEI EXHIBIT D

Kimberly D. Ockene
May 12, 2006
Page 2

The total cost of the Production copies is \$419.25. Please remit payment to Fulbright & Jaworski LLP, which you can send to my attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Zeiler Joiner", with a long, sweeping flourish extending to the right.

Lisa Zeiler Joiner

Encs.