

EXHIBIT PP

**MOTION FOR PARTIAL SUMMARY JUDGMENT BY
DEFENDANTS KATHERINE MEYER, ERIC GLITZENSTEIN, AND
MEYER GLITZENSTEIN & CRYSTAL**

Civ. No. 07-1532 (EGS/JMF)



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

January 5, 2004

[REDACTED]
[REDACTED]
Philadelphia, PA [REDACTED]

Dear Ms. [REDACTED]:

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

Thank you again for your support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

June 15, 2005

[REDACTED]
[REDACTED]
[REDACTED]
Washington, D.C. [REDACTED]

Dear [REDACTED]

Thank you for your generous contribution to The Wildlife Advocacy Project for our efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization your contribution is tax deductible.

Thank you again for your support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President



1601 CONNECTICUT AVENUE, N.W.
SUITE 700
WASHINGTON, D.C. 20009
(202) 518-3700

June 7, 2004

[REDACTED]

Dear Ms. [REDACTED]

Thank you very much for your contribution of [REDACTED] to the Wildlife Advocacy Project for Tom Rider's important work related to the treatment of elephants by Ringling Brother's. Your contribution is tax deductible since the Project is a 501(c)(3) organization.

We greatly appreciate your continued support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President

ADVOCATES FOR WILDLIFE, ANIMALS AND THE EARTH
FACSIMILE (202) 588-5049
WWW.WILDLIFEADVOCACY.ORG



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

November 26, 2003

[REDACTED]

Dear Mr. [REDACTED]

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

Thank you again for your support.

Sincerely,

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Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

November 26, 2003

[REDACTED]

Dear Mrs. [REDACTED]

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

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Sincerely,

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Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

November 26, 2003

Ms. [REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]:

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

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Sincerely,

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Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

December 9, 2003

[REDACTED]

[REDACTED]
#SS9

Dear [REDACTED]:

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

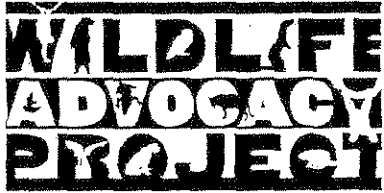
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Thank you again for your support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
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Washington, D.C. 20009
(202) 518-3700

December 16, 2003

[REDACTED]

Dear Ms. Judge:

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

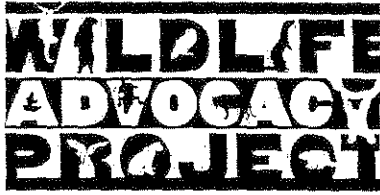
Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

Thank you again for your support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

December 16, 2003

[REDACTED]
[REDACTED]
[REDACTED]

Dear Ms. Moffett:

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

Thank you again for your support.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Glitzenstein".

Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

December 9, 2003

[REDACTED]


[REDACTED]
#1187

Dear Ms. [REDACTED]

Thank you very much for your recent contribution to The Wildlife Advocacy for Tom Rider's efforts to educate the public about what goes on behind the scenes at the Ringling Brothers' circus. Your contribution will help Tom continue his efforts to be a voice for the elephants.

Because The Wildlife Advocacy Project is a tax-exempt, 501(c)(3) organization, your contribution is tax deductible.

Thank you again for your support.

Sincerely,

Eric R. Glitzenstein
President



1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

November 3, 2003

Sent by Overnight Mail

[REDACTED]
[REDACTED]
Los Angeles, California [REDACTED]

Re: Media Project Concerning Ringling Bros.'
Abuse Of Asian Elephants

Dear Ms. [REDACTED]

On behalf of the Wildlife Advocacy Project, I want to thank you for your extremely generous grant of [REDACTED] to support Tom Rider's efforts to shed the light of public scrutiny on Ringling Bros.' treatment of endangered Asian elephants. With the help of your grant money, Tom has been very successful in the last few months gaining public attention for this very important animal welfare issue, including a very effective piece on NBC in Manchester, New Hampshire last week, which I have enclosed. Tom's activities and appearances over the last few months have included the following:

7/16/03 - LA Media: Los Angeles - Fox News network, filmed at LA Coliseum - [circus in town] - KCAL (Channel 9); Telamundo (Spanish station) - all 3 did interviews;

7/17/03 - spoke to Long Beach City Council - [RB in Long Beach] - covered by local Long Beach paper

7/23/03 - San Diego - attended protest at Arena with activists from SD;

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[REDACTED]
November 3, 2003

8/13/03 - Reno, Nevada - [with [REDACTED]] filmed RB hooking the elephants; helped students with protest; filmed loading of elephants on trains;

8/22/03 - San Francisco - interviewed by CBS (Channel 5); attended protests at Oakland Arena and filmed RB;

Interviewed by - Santa Meteo Times;

9/4/03 - Peoria, Ill. [circus there] - interviewed by Channel 25 (NBC); WRAU - Channel 19;

9/22 - 10/31:

New Haven, CT - (for next month - working Boston, Manchester NH, Harrisburg, Pa, Bridgeport Ct, Hartford, Ct):

Manchester, NH: Linda Dionne, "New Hampshire Animal Rights"

9/23/03 - did cable show ; aired repeatedly for next 30 days [local public access channel - sent to Derry, NH];

Bridgeport, Ct - one-hour live talk radio show - "Citizen Smith" - AMWICC (Ken Smith) - lots of call-ins ; worked with local group, [REDACTED]


10/27-28/03 - Harrisburg, Pennsylvania: working with the [REDACTED] - featured speaker at Capital Rotunda for rally;

10/30/03 - Manchester, New Hampshire, Exclusive NBC Report (videotape enclosed).

As you can see, Tom has been very busy in assisting grass roots groups around the country with their efforts to educate the public about what goes on behind the scenes at the circus. He has also been effective in assisting local legislative efforts to address this issue, and in getting important media coverage. Quite simply, he could not possibly have accomplished any of this without your generous support.

Tom would very much like to continue his efforts, and we believe there is a tremendous value in having him out there as long as possible. Accordingly, we are seeking additional funding for these efforts, and are hoping that you would be willing to provide another tax deductible grant for this purpose.

Please let me know if you have any questions or need any additional information. I can also refer you to individuals in these local grass roots groups who can attest to the effectiveness of Tom's work. Again, thank you very much for your support thus far. It has definitely been


November 3, 2003

invaluable in giving voice to these magnificent animals who are treated so poorly for commercial gain.

Sincerely,


Katherine A. Meyer

Enc.



1601 Connecticut Avenue, N.W.

Suite 700

Washington, D.C. 20009

(202) 518-3700

December 11, 2003

[REDACTED]

Re: Media Project Concerning Ringling Bros.
Abuse Of Asian Elephants

Dear Ms. [REDACTED]

We received your December 1, 2003 donation of [REDACTED] for this project. Thank you so much! Your generous grant will be extremely helpful in continuing this important effort. In fact, there should be an article in USA Today on Monday, December 15, 2003, and the St. Petersburg Times is also doing a story. Without your assistance, this would not have happened.

I enjoyed talking to you on the phone the other day and hope that we can meet in person one of these days. We will keep you posted on further developments.

Again, thank you. I hope you have joyous and peaceful holidays.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine A. Meyer". The signature is fluid and cursive.

Katherine A. Meyer

ADVOCATES FOR WILDLIFE, ANIMALS AND THE EARTH
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1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

October 7, 2004

[REDACTED]
[REDACTED]
Los Angeles, California [REDACTED]

Re: Media Project Concerning Ringling Bros.
Abuse Of Asian Elephants

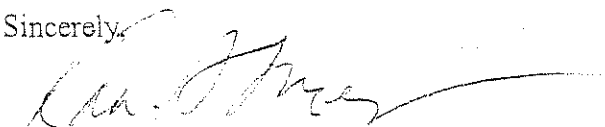
Dear Ms. [REDACTED]

On behalf of the Wildlife Advocacy Project, I want to thank you again for your most recent grant of [REDACTED] to support Tom Rider's efforts in 2004 to shed light on Ringling Bros.' mistreatment of endangered Asian elephants. With the help of your grant money, Tom has continued to be very successful in keeping the spotlight on this important animal welfare issue. He most recently was instrumental in getting an excellent story aired on Channel 2 in San Francisco, when the circus was performing there. I have enclosed a copy of that piece on videotape for you. Today, Tom attended a press conference with Senator Hedlund in Boston, which we hope will aired tonight (since the circus is currently there). Tom's activities are extremely important to this cause – he is the one that the reporters always want to talk to.

We could not possibly have accomplished any of this important media work without your major contributions. Thank you again. In connection with our effort to find additional funding sources for the next year, I have told both [REDACTED] and Mike Markarian of the Fund for Animals of your generous and absolutely crucial contributions to this cause.

Once again, thank you so much for your continued support.

Sincerely,


Katherine A. Meyer

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1601 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20009
(202) 518-3700

April 19, 2005

[REDACTED]
[REDACTED]
Los Angeles, California [REDACTED]

Re: Media Project Concerning Ringling Bros.'
Abuse Of Asian Elephants

Dear [REDACTED]

On behalf of the Wildlife Advocacy Project, I want to thank you again for the grant of [REDACTED] that we received on April 11, to support Tom Rider's efforts to shed light on Ringling Bros.' mistreatment of endangered Asian elephants. With the help of your grant money, Tom will be able to continue traveling around the country to educate the public – through the media, grass roots organizations, and local hearings about this very important animal welfare issue. As you know, as a direct result of Tom's work, a coveted Genesis Award was recently presented to the reporter who aired an excellent piece on the circus last fall, and Tom also recently generated extensive media coverage of this issue in the LA area. He also recently assisted grass roots groups on the east coast, including Florida, Boston, and New Hampshire, in presenting this issue to the public.

Particularly in light of the fact that he is up against a well financed public relations effort on the part of Ringling Bros., we have been very pleased with Tom's efforts on this project. Indeed, one by one circuses around the country are giving up their elephant acts, on the ground that the public has become increasingly aware of what is entailed in keeping elephants in captivity, and particularly in teaching them "tricks" that they must do command. As you probably know, just a few days ago, the Cole Bros. circus announced that it would stop using exotic animals, including elephants, in its circus (see enclosed). We believe that Tom's efforts have definitely played a huge part in educating the public about this issue and, in turn, in helping to make this practice archaic – one step at a time.

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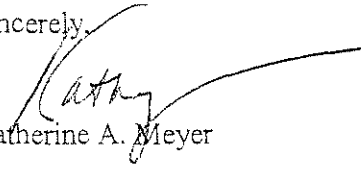
April 19, 2005

Page 2

We could not possibly have accomplished any of this important work without your major contributions. On a personal note, I have very much enjoyed working with you, and hope that we can continue working together on this and other animal welfare issues.

Once again, thank you so much for your continued support. I will definitely keep you posted on all major developments.

Sincerely,



Katherine A. Meyer

Enc.