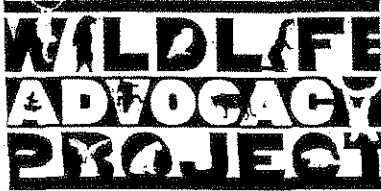


EXHIBIT UU

**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

March 21, 2005

[REDACTED]
President
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

As you know, last year you gave the Wildlife Advocacy Project a [REDACTED] grant for the purpose of assisting in [REDACTED] work to develop and implement training programs for environmental activism. When we received the grant, I advised you (in a March 23, 2004 letter) that [REDACTED] had taken a leave of absence from the Wildlife Advocacy Project, but that we anticipated she would return in 2005, and that we would keep your grant on hand until her return. Unfortunately, as it turns out [REDACTED] is not returning to the Wildlife Advocacy Project, and so we cannot use the grant as initially intended.

In the March 23, 2004 letter, I said that, "[i]f for whatever reason, [REDACTED] does not return to the Wildlife Advocacy Project, we will reach a mutually acceptable decision on alternative ways of spending the grant so that it furthers the Foundations' objectives." One option is for us to return the grant to the Foundation, which we are, of course, fully able and willing to do if that is what you prefer.

Another option is to spend the money on another mutually agreeable project where the money would help promote wildlife interests. One possibility along those lines involves a project we are now pursuing against Ringling Brothers Circus for its mistreatment of endangered Asian elephants. Along with a pioneering lawsuit that is being pursued by Meyer & Glitzenstein on behalf of the ASPCA and other organizations against Ringling Brothers for "taking" the elephants in violation of the Endangered Species Act, the Wildlife Advocacy Project has been attempting to educate the public about the systemic mistreatment of elephants in the circus (including routine beatings with bullhooks, chaining for many hours with no interaction or

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psychological enrichment, and forced separation of mothers and babies). In particular, we have been helping to support the public education efforts of Tom Rider, a former Ringling Brothers worker with inside knowledge of how the elephants are treated and who "tracks" the circus around the country and has done remarkably well with extremely limited resources in getting the word out on local television and radio programs. Some or all of the [REDACTED] you gave to the Wildlife Advocacy Project would be enormously helpful in continuing these efforts to enlighten the public on what really goes on in circuses.

Obviously, still another option would be to [REDACTED]

[REDACTED]

Regards,


Eric R. Glitzenstein

ERG/ms

Eric Glitzenstein

From: Eric Glitzenstein
Sent: Friday, April 08, 2005 3:43 PM
To: [REDACTED]
Subject: RE: Wildlife Advocacy Project

[REDACTED] – Thanks for the kind words and your continued support for our work. It means a lot to us, especially coming from someone as committed and knowledgeable as yourself. We will definitely put the funds to good use and keep you posted on our progress. And thanks for the tip on [REDACTED] we will follow up on that.

Take care,

Eric

✓
From: [REDACTED]
Sent: Thursday, April 07, 2005 11:44 AM
To: Eric Glitzenstein
Subject: Wildlife Advocacy Project

Eric,

You are one of the most creative and potent protectors of our world that I know.

I have full confidence that whatever you choose to do with the funds available will be the best and wisest use of those funds.

Please make the appropriate decision for the use of those funds on behalf of the [REDACTED] Family Foundation.

I had dinner last week with [REDACTED] and her boss [REDACTED]. She is doing great work for [REDACTED]. While I'm sorry she is not pursuing the school for activists, she is nevertheless applying her many talents in a productive manner.

I have a dear friend, [REDACTED], who helps me greatly with the [REDACTED]. She is also closely connected with the freedom for primates community, and the same for the elephant retirement center in Tennessee. She would be an excellent resource for Tom Rider.

My best,

✓
[REDACTED]

4/11/2005