

EXHIBIT BBB

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

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

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FELD ENTERTAINMENT, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 07-1532 (EGS/JMF)
)	
)	
ANIMAL WELFARE INSTITUTE, et al.,)	
)	
Defendants.)	

DECLARATION OF MICHELLE SINNOTT

I, Michelle Sinnott, declare as follows:

1. I was employed as a paralegal at Meyer Glitzenstein & Crystal (“MGC”) from May 2006 through August 2010. During that time I was the MGC employee principally responsible for organizing and maintaining all documents, including discovery, associated with the case ASPCA v. Feld Entertainment Inc., Civ. No. 03-2006. Since that time, I have graduated from law school and I am now working as a law fellow with MGC.

2. As part of my paralegal responsibility, I maintained contemporaneous records of what dates documents were produced to and received from Feld Entertainment Inc. (“FEI”) throughout the discovery process in that case. Whenever documents were exchanged I would create a record indicating (1) the date the document[s] were produced or received and (2) all of the Bates label numbers associated with the documents produced or received on that particular date.

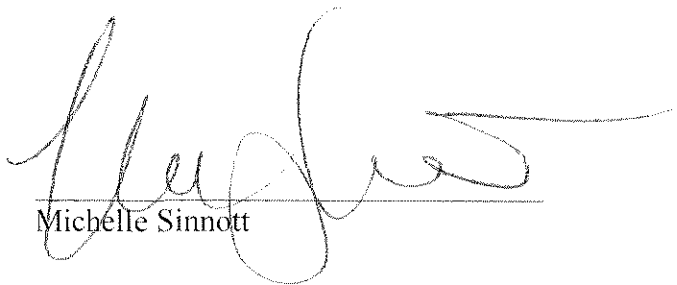
3. Based on a review of the records I created pursuant to my responsibilities, I can attest that the following MGC Exhibits, submitted in support of MGC’s Motion for Partial Summary

Judgment, were produced to FEI on the following dates:

- (1) MGC Ex. V (AWI 01832-1833) was produced in June 2004,
- (2) MGC Ex. W (A 00046) was produced in June 2004,
- (3) MGC Ex. X (A 00073) was produced in June 2004,
- (4) MGC Ex. Y (A 00884) was produced in June 2004,
- (5) MGC Ex. Z (A 00886) was produced in June 2004, and
- (6) MGC Ex. AA (A 00894-895) was produced in June 2004.

I declare that under penalty of perjury that the foregoing is true and correct.

Executed this 15 day of October, 2013



Michelle Sinnott