

PRODUCTION DATES OF RIDER PAYMENT TRIAL EXHIBITS
AWI et al. v. Feld Entertainment, Inc., Civ. No. 03-2006 (D.D.C.) (EGS/JMF)

TRIAL EXHIBIT NUMBER AND DESCRIPTION	PRODUCTION DATE <i>Exs. 5-8, ESA Action Document Production Letters</i>
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I. RIDER PAYMENT TRIAL EXHIBITS PRODUCED BEFORE 2-16-06

<p>DX 39 (Letter from Tom Rider to Pat Derby (PAWS) (5/14/01)</p> <p>TR 00001</p>	<p>6-9-04</p>
<p>DX 46 (Email from Lisa Weisberg to Larry Hawk (5/7/01)</p> <p>A 00046</p>	<p>6-9-04</p>
<p>DX 62 (Fundraiser Invitation)</p> <p>AWI 00925.</p>	<p>Copy of DX 62 marked as an exhibit at ASPCA Rule 30(b)(6) Deposition (7-19-05)</p>

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II. RIDER PAYMENT TRIAL EXHIBITS PRODUCED AFTER 2-16-06

DX 16 (Rider Interrogatory Responses)	DX 16 at 12-13 (Initial response that was “false,” FOF 55-56): 6-9-04 DX 16 at 25-28 (Court ordered responses): 9-24-07
DX 18R (ASPCA Interrogatory Responses)	DX 18R at 6-11 (Initial responses which “omitted” that payments to MGC and WAP were to or for Rider, FOF 57): 6-9-04 DX 18R at 21-23 (Court ordered responses): 9-26-07
DX 19 (AWI Interrogatory Responses)	DX 19 at 6-8 (Initial responses that failed to disclose Rider payments, FOF 57): 6-9-04 DX 19 at 18-21 (Court ordered responses): 9-24-07
DX 20R (FFA Interrogatory Responses)	DX 20R at 12-19 (Initial responses that failed to disclose Rider payments, FOF 57): 6-9-04 DX 20R at 32-35 (Court ordered responses): 9-24-07
DX 21 (API Interrogatory Responses)	DX 21 at 5-7: 1-16-07 DX 21 at 11-13 (Court ordered responses): 9-24-07

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DX 37 (Letter from Katherine Meyer to Tom Rider (4/12/05)) WAP 262	6-30-06 [unredacted copy] <i>See also Ex. 20, Comparison of WAP Van Grant Letter (DX 37)</i>
DX 48A (Summary of Rider Payments) Summary exhibit citing to DX 18-20, 49-50, 54-55, 57, 61, 63-64, 67, 209	See production dates for DX 18-20, 49-50, 54-55, 57, 61, 63-64, 67, 209, cited herein.
DX 49 (WAP Ledger of Payments to Rider) September 24, 2007 WAP-004-009 November 30, 2007 WAP-001	6-30-06 [unredacted copy of ledger dated 3-20-01 to 9-26-05] 3-30-07 [ledger dated 9-30-05 to 3-27-07] 9-24-07 [ledger dated 3-20-2001 to 9-12-07] 11-30-07 [ledger dated 9-25-07 to 11-27-07]. <i>*Documents produced on 9-24-07 and 11-30-07 were marked as DX 49.</i> <i>See also Ex. 17, Comparison of WAP to Rider Ledger (DX 49)</i>
DX 50 (WAP Ledger of Payments Received for Rider) September 24, 2007 WAP-002-003 November 30, 2007 WAP-002	6-30-06 [unredacted copy of ledger dated 11-6-00 to 7-13-05] 3-30-07 [ledger dated 10-3-05 to 3-26-07] 9-24-07 [ledger dated 11-6-00 to 9-12-07] 11-30-07 [ledger dated 11-5-07 to 11-27-07]. <i>*Documents produced on 9-24-07 and 11-30-07 were marked as DX 50.</i> <i>See also Ex. 18, Comparison of WAP Deposit Ledger (DX 50)</i>

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<p>DX 51 (Checks from WAP to Tom Rider)</p> <p>WAP 402-99 WAP 500-501 WAP 540-541 March 30, 2007 WAP-005-256 (various documents within bates range) September 24, 2007 WAP-012-050 (various documents within bates range) November 30, 2007 WAP-001-66 (various documents within bates range)</p>	<p>WAP 402-99: 6-30-06 WAP 500-501: 6-30-06 WAP 540-41: 7-20-06 March 30, 2007 WAP-005-256 (various documents within bates range): 3-30-07 September 24, 2007 WAP-012-050 (various documents within bates range): 9-24-07 November 30, 2007 WAP-001-66 (various documents within bates range): 11-30-07</p>
<p>DX 52 (Tom Rider's Receipts)</p> <p>TR 00221-394 TR 0466-545 TR 00612 TR 00614 TR 0627-703</p>	<p>TR 00221-394, 0466-545, 00612, 00614: 9-24-07</p> <p>TR 0627-703: 1-30-08</p> <p><i>*WAP produced an initial set of Rider's receipts on 6-30-06 (WAP 273-394).</i></p>

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<p>DX 53 (Letters from Eric Glitzenstein to Tom Rider)</p> <p>TR 00207-209 TR 00376-399 TR 00400-455 TR 00462-465 TR 00619-625</p>	<p>TR 207-209: 3/2/07</p> <p>TR 00376-399, TR 0400-455, TR 0462-465: 9-24-07</p> <p>TR 00619-626: 1-30-08</p> <p><i>*WAP produced a redacted set of the letters from Glitzenstein to Rider on 9-29-05 (WAP 260-61, 263-66). The fact that the grants were for media work in particular cities was redacted. Ex. 19, Comparison of WAP Grant Letters (DX 53); WAP 9-29-05 Privilege Log at 31-33 (noting redactions of documents WAP 260-61, 263-66).</i></p>
<p>DX 54 (IRS Forms 1099 Issued to Tom Rider by WAP)</p> <p>TR 00457-461 TR 00197 TR 00626 M 107-111 M 113 WAP 398-401 WAP March 30, 2007 WAP-125 WAP September 24, 2007, WAP-051</p>	<p>TR 00457-461: 9-24-07</p> <p>TR 00197: 1-31-07</p> <p>TR 00626: 1-30-08</p> <p>M 107-111: 2-8-08</p> <p>M 113: 2-8-08</p> <p>WAP 398-401: 6-30-06</p> <p>WAP March 30, 2007 WAP-125: 3-30-07</p> <p>WAP September 24, 2007 WAP-051: 9-24-07</p>

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TRIAL EXHIBIT NUMBER AND DESCRIPTION	PRODUCTION DATE <i>Exs. 5-8, ESA Action Document Production Letters</i>
DX 55 (IRS Forms 1099 Issued to Tom Rider by MGC) TR 00456 / M 106	TR 00456: 9-24-07 (TR 00456) M: 106 2-8-08 (M 106)
DX 56 (IRS Form 1099 Issued to Rider by PAWS) TR 00613	9-24-07
DX 57 (IRS Wage and Income Transcript for PAWS Earnings in 2001) TR 00565	9-24-07
DX 58A (Federal Express Airbills) M 0001-105	2-8-08
DX 60 (Rider's Tax Returns, 2000-2006) TR 00546-611	9-24-07

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<p>DX 61 (Meyer, Glitzenstein & Crystal Invoices Reflecting Payments to Rider)</p> <p>A 1203-215 A 01219-220 AWI 10054-057 AWI 09934-935 AWI 10048-049 AWI 00938-939 AWI 10050-053 AWI 09936-037 AWI 09932-933 F 04513-516; F 04493-512</p>	<p>9-24-07 & 9-26-07</p>
<p>DX 63 (AWI Check to an Employees for Wire Transfer to Tom Rider)</p> <p>AWI 009946</p>	<p>9-24-07</p>

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DX 64 (FFA Accounting Record Concerning Payment to Tom Rider) F 004485-486	9-24-07
DX 65 (Partial Email (Pages 2 and 3) From Katherine Meyer to Lisa Weisberg, Michael Markarian and Cathy Liss (11/5/03)) WAP 270	6-30-06
DX 66 (API Letters to WAP) API 2858-873 API 7203-206	API 2858-873: 1-31-07 API 7203-206: 5-3-07
DX 67 (HSUS Letters to WAP) (Produced by HSUS)	12-13-07

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<p>DX 209 (Documents Produced on 8-11-08)</p> <p>A 01222-Revised-A 01230-Revised A 01231-Revised-A 01239-Revised A 01240-Revised-A 1250 Revised AWI 10050-Revised-AWI 100053-Revised F 04502-Revised-F 04506-Revised F 04507-Revised-F 04510-Revised IC 203/F 04546 IC 196/A 01254 IC 201/A 01255 IC 076/AWI 10139</p>	<p>8-11-08</p>
<p>DX 346 (Glitzenstein Deposition)</p>	<p>12-21-07 & 1-29-08</p>