

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

*Plaintiff,*

–v–

JEFFREY LOWE, LAUREN LOWE,  
GREATER WYNNEWOOD EXOTIC  
ANIMAL PARK, LLC, and TIGER KING,  
LLC,

*Defendants.*

Case No. 6:20-cv-00423-JFH

**PROPOSED INTERVENOR-PLAINTIFF PEOPLE FOR THE ETHICAL TREATMENT  
OF ANIMALS' BRIEF IN SUPPORT OF MOTION TO INTERVENE**

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### **Statement of Compliance With LCvR 7.1(f)**

Proposed Plaintiff-Intervenor People for the Ethical Treatment of Animals, Inc. (“PETA”) has fulfilled its obligation to meet and confer with counsel of record for Defendants and the Plaintiff the United States of America under LCvR 7.1(f). Counsel for the United States, by telephone conference and email (allowed under LCvR 7.1(f) given the significant distance between offices of counsel), informed PETA that the United States does not oppose PETA’s requested intervention, but reserves the right to move the Court to place any limits on PETA’s participation it may deem reasonable and necessary. During an in-person meet and confer with counsel for Defendants held Tuesday, April 20, 2021, counsel discussed the parties’ positions with respect to the proposed intervention, after which counsel for Defendants informed PETA’s counsel that his clients intend to oppose PETA’s motion to intervene, on grounds to be set out in their opposition.

### **Preliminary Statement**

PETA is a non-profit dedicated to protecting animals from abuse, neglect, and cruelty. For many years, this has meant confronting Jeffrey Lowe, Lauren Lowe, and their many business partners and facilities through, among other means, fielding public complaints, conducting investigations, submitting public records requests and regulatory complaints, publishing press releases and other media content, coordinating public demonstrations, and prosecuting litigation in Florida, Indiana, and Oklahoma.

These measures were necessitated by PETA’s mission. For years, Defendants have been the hub of a national industry of hands-on interaction between members of the public and exotic animals including lions, tigers, and hybrids thereof. As some of the highest profile exploiters and abusers of animals, including those protected by the Endangered Species Act (“ESA”), Defendants’ ongoing operations have significantly impaired PETA’s mission. In addition, Mr. Lowe and Mrs. Lowe and their accomplices, many of whom are Defendants in this action, have

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