



**N O N H U M A N R I G H T S P R O J E C T**

August 14, 2023

Christopher O. Murray  
Brownstein Hyatt Farber Schreck, LLP  
675 15th Street, Suite 2900  
Denver, Colorado 80202

Re: *The Nonhuman Rights Project v. Cheyenne Mountain Zoological Society et al* (Case No. 2023CV31236)

Dear Mr. Murray:

In my previous letter dated July 24, 2023, I advised you that the Nonhuman Rights Project, Inc. (“NhRP”) will withdraw its habeas corpus petition on behalf of Missy, Kimba, Lucky, LouLou, and Jambo if Respondents agree to allow the elephants to be transferred to an elephant sanctuary accredited by the Global Federation of Animal Sanctuaries. On August 11, 2023, you informed me that your clients have declined our offer. Therefore, we have no reason to withdraw our petition.

Our settlement offer remains open. Because the elephants are entitled to their freedom, please advise your clients that the NhRP is fully prepared to litigate this case to its ultimate conclusion, including in the Colorado Supreme Court if necessary.<sup>1</sup>

Sincerely,

/s/ Jake Davis

Jake Davis, Esq.

[REDACTED]  
[REDACTED]  
(513) 833-5165

Attorney for Petitioner Nonhuman Rights Project, Inc. on behalf of  
Missy, Kimba, Lucky, LouLou, and Jambo

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<sup>1</sup> Regarding your clients’ intention to seek attorney fees from the NhRP for allegedly bringing “substantially groundless, frivolous and vexatious claims,” kindly advise them that we are also fully prepared to demonstrate the emptiness of this threat, should the opportunity arise.