

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE)
PREVENTION OF CRUELTY TO)
ANIMALS, <i>et al.</i> ,)
)
Plaintiffs,)
)
v.)
)
RINGLING BROS. AND BARNUM &)
BAILEY CIRCUS, <i>et al.</i> ,)
)
Defendants.)
_____)

Case No. 1:03-cv-02006 (EGS/JMF)

DX 27

**EXHIBIT 27
TO
REPLY IN SUPPORT OF DEFENDANT’S MOTION
FOR SUMMARY JUDGMENT**

institutions that are being managed totally or primarily in some version of a "free contact" management system. The remainder utilize a "protected contact" management system.

6. A free contact management system is any one in which the handler or keeper is generally right next to, and in immediate contact with, the elephant with no physical barrier between them. Free contact management is a commonly practiced and generally accepted approach to management of elephants in captivity.

7. It is my experience that free contact management of elephants nearly always incorporates regular use of what the EHRG refers to as a "guide" and is sometimes inaccurately by this standard called an "ankus" or "bullhook."

8. A protected contact management system is any one in which elephants are handled through or from behind a barrier with direct physical contact between elephant and handler restricted to specific and limited locations.

9. In my experience, many of those facilities that use a protected contact management system also utilize a guide to some extent.

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

Executed on this 26th day of October, 2006.



Deborah Olson