

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**AMERICAN SOCIETY FOR THE
PREVENTION OF CRUELTY TO
ANIMALS, et al.,**

Plaintiffs,

V.

**RINGLING BROS. AND BARNUM &
BAILEY CIRCUS, et al.,**

Defendants.

Case No. 03-2006 (EGS/JMF)

EXHIBIT I

TO

**DEFENDANT FELD ENTERTAINMENT, INC.'S
MOTION TO COMPEL TESTIMONY OF PLAINTIFF
TOM EUGENE RIDER AND FOR COSTS AND FEES**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMERICAN SOCIETY FOR
THE PREVENTION OF
CRUELTY TO ANIMALS, et
al.,

Civ. No. 03-2006 (EGS)
Plaintiffs, (D.D.C.)

vs.

RINGLING BROS. AND
BARNUM & BAILEY CIRCUS,
et al.,

Defendants. /

VIDEOTAPED DEPOSITION OF ROBERT RIDLEY

Friday, August 25, 2006

9:25 a.m.

CLARION HOTEL

1355 N. Fourth Street

San Jose, California 95112

Danielle Reading, CSR #10826

#06-350DR

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1 A Post Office Box 1869, Palmetto, Florida.
 2 Q And have you ever been deposed before, sat for a
 3 deposition like we're doing today?
 4 A No.
 09:27:06 5 Q Have you ever been convicted of a crime?
 6 A No.
 7 Q Are you aware that you are here today pursuant
 8 to a subpoena that was issued to you earlier this
 9 month and that was accepted on behalf of your
 09:27:22 10 attorneys?
 11 MS. PARDO: Are you aware?
 12 THE WITNESS: Yes.
 13 MS. OCKENE: Okay. I'd like to have this
 14 marked as Exhibit 1.
 09:27:31 15 (Whereupon, Plaintiffs' Exhibit 1 was marked
 16 for identification.)
 17 Q BY MS. OCKENE: Please take a look at Exhibit 1.
 18 Have you seen this document before?
 19 A No.
 09:27:57 20 MS. OCKENE: Okay. I'll just represent for
 21 the record that this is the subpoena that was issued
 22 to Mr. Ridley and accepted by his attorneys.
 23 Q BY MS. OCKENE: Okay. Mr. Ridley, I'm going to
 24 ask you a series of questions. And please let me know
 09:28:11 25 if at any time you don't understand my question and

1 what is the highest level of formal
 2 education that you obtained?
 3 A Tenth grade.
 4 Q Tenth grade. And what year did you complete
 5 tenth grade, to the best of your recollection?
 6 A 1959.
 7 Q So did you graduate high school at any time
 8 thereafter?
 9 A No.
 10 Q And have you received any post-tenth-grade
 11 educational training of any kind, formal?
 12 A No. No.
 13 Q No. Okay. So what did you do when you left
 14 tenth grade -- after tenth grade?
 15 A I went into the military for three years.
 16 Q What branch of the military?
 17 A Army.
 18 Q So that would have been about 1960 to '63?
 19 A 1964 to '66.
 20 Q So can you recall what you were doing between
 21 the years of 1959 and 1964? Did you have a job?
 22 A I worked at a reptile garden in Michigan.
 23 Q Reptile garden?
 24 A Yes.
 25 Q Do you recall the name of the reptile garden?

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1 need clarification. If you don't ask for
 2 clarification, I'll assume that you understand my
 3 question.
 4 If at any time you need a break, please let
 09:28:23 5 me know and we can arrange it.
 6 MS. PARDO: For the record, we actually
 7 would like to state that Mr. Ridley has a medical
 8 condition that will require bathroom breaks, and he'll
 9 be letting you know when he needs to do that.
 09:28:34 10 MS. OCKENE: Okay. Fine.
 11 Q BY MS. OCKENE: Please answer audibly when I ask
 12 you a question. And rather than shaking your head or
 13 nodding your head, you need to actually state your
 14 answer.
 09:28:43 15 A Yes.
 16 Q And I'd ask you please also to let me finish my
 17 questions before you begin your answers, and I'll do
 18 the same for you.
 19 A Yes.
 09:28:53 20 Q I'll try not to interrupt you.
 21 Okay. Do you have any questions before we
 22 begin? Do you understand the instructions?
 23 A Yes.
 24 Q I just want to ask you a few questions about
 09:29:04 25 your educational background.

1 A Snakes Alive.
 2 Q And how many years were you there for?
 3 A Off and on, about seven.
 4 Q So just so I understand the chronology: After
 5 tenth grade, you went to work at the reptile garden?
 6 A Yes.
 7 Q And then did you stay there until you went into
 8 the military?
 9 A Yes. And I worked there before that, too. A
 10 summer-type job from school.
 11 Q Okay. And what were your duties at the reptile
 12 garden?
 13 A As a guide/lecturer.
 14 Q Lecturing to the public?
 15 A Yes, to the public, on reptiles.
 16 Q What type of reptiles were there? Do you
 17 recall?
 18 A All types. Snakes, lizards, alligators,
 19 turtles. We did venom extraction.
 20 Q And while you were there, did you obtain any
 21 on-the-job training concerning animal behavior or the
 22 reptile behavior?
 23 A Just the venom extraction.
 24 Q What is venom extraction?
 25 A It's extracting venom from a poisonous snake.

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1 Q While they are anesthetized? Or...

2 A No. No.

3 Q So how do you do that?

4 A They were pinned in the back of the neck and

09:32:13 5 picked up.

6 Q So who trained you how to do that?

7 A The owners.

8 Q Do you recall the names of the owners?

9 A I believe their name was Allen.

09:32:25 10 Q Allen. That's first name or the --

11 A Last name.

12 Q Last name, Allen. Do you recall the first name?

13 A His first name is Paul.

14 Q Paul. Okay.

09:32:37 15 And did you -- aside from how to do venom

16 extraction, did you receive any training in veterinary

17 techniques or veterinary medicine?

18 A At the reptile gardens?

19 Q Yes.

09:32:53 20 A No.

21 Q Was it only reptiles at the reptile garden or

22 were there other animals?

23 A Just reptiles.

24 Q Okay. So you worked there until you went into

09:33:06 25 the military?

1 A Yes.

2 Q What led you to Ringling Bros.?

3 A It was an employment agency.

4 Q Okay. So were you hired by Ringling Bros.?

5 A Yes.

6 Q In 1966?

7 A Yes.

8 Q Okay. And what were you hired to do?

9 A Work with the elephants.

10 Q Who hired you?

11 A Mr. Elden Day.

12 Q Elden Day?

13 A Day.

14 Q And was he in charge of the elephants at the

15 time?

16 A No. He hired the personnel for the circus.

17 Q Okay. So we'll come back to this.

18 So -- but between your military service and

19 your work -- your hiring by Ringling Bros., you did

20 not have any other jobs?

21 A No.

22 Q Okay. So you were hired in 1966 at the winter

23 quarters of Ringling Bros.?

24 A Yes.

25 Q Okay. Solely to work with the elephants?

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1 A Yes.

2 Q And then you went to the military for

3 approximately three years?

4 A Yes.

09:33:10 5 Q And then what were the circumstances of your

6 departure from the military?

7 A Honorable discharge.

8 Q Where did you serve? Where were you located

9 during your service?

09:33:26 10 A The first six months, I was in the United

11 States. Two years in Germany, and then six months

12 back in the States.

13 Q And why did you leave?

14 A Like I said, military discharge. It was the end

09:33:51 15 of my --

16 Q End of your --

17 A -- my tour.

18 Q Okay. And what did you do when you left the

19 Army?

09:33:56 20 A I went to Florida. I was looking for a job

21 working with animals. And I went to the winter

22 quarters of the Ringling Bros. circus. And asked for

23 a job.

24 Q Okay. So that would have been -- just to

09:34:20 25 understand the timing, was that in 1966?

1 A Yes.

2 Q Any other duties other than to work with the

3 elephants?

4 A No.

5 Q And when you say work with the elephants, can

6 you specifically describe the duties that you were

7 hired to perform.

8 A As a barnman.

9 Q And what does that mean exactly?

10 A Cleaning up in back of the elephants.

11 Q Anything else?

12 A No, that was it.

13 Q Feeding? Watering? Any other care for the

14 animals?

15 A Occasionally feeding and watering. They were

16 very short-staffed at that time.

17 Q And at the time, did Ringling Bros. have units

18 like it has today?

19 A No. It was just one circus.

20 Q So you were hired to be a barnman for all of the

21 elephants that Ringling Bros. had at the time?

22 A Yes.

23 Q Were there other barnmen as well?

24 A Yes.

25 Q How many elephants did Ringling Bros. have at