

Plaintiffs' Exhibit 15
Motion To Compel Inspections
(Civ. No. 03-2006 (EGS/JMF))

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

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

vs.

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

Defendants. _____/

**CERTIFIED
COPY**

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

Landi Court Reporters

1292 Lincoln Ave. • San Jose, CA 95125
Tel: 408.279.8590 • Fax: 408.279.0577

lourdes@landireporters.com • www.landireporters.com

1 A Yes.

2 Q Okay. So you are saying you do not have any
3 special responsibilities with respect to Karen?

4 A Yes, I do. Her care, feeding, foot care,
5 whatever promotional things that might arise.

6 Q So would you consider yourself to be her primary
7 caretaker?

8 A No.

9 Q Do you present her in the show?

10 A Part of the show I do.

11 Q So when I asked you if you have a special
12 relationship with any elephant and you said Karen, in
13 what way did you mean?

14 A Well, I helped bottle-feed her when she was
15 young. And as she got a little older, we did what we
16 call touch tours for handicapped and blind children.
17 I would take her in for that.

18 Q Okay. Would you say that Karen requires any
19 special handling, different than other elephants?

20 A No.

21 Q Does Karen ever remain chained on the road when
22 other elephants are not chained?

23 A I can't remember that she's chained when any
24 other elephants -- the other elephants are loose.

25 Q So recently you would say she is not -- there's