

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 BROTHERS AND BARNUM & BAILEY)	
CIRCUS, <i>et al.</i> ,)	
)	
Defendants.)	

Civ. No. 03-02006
(EGS)

**OBJECTIONS AND RESPONSES TO DEFENDANTS'
FIRST SET OF DOCUMENT PRODUCTION REQUESTS
TO PLAINTIFF TOM RIDER**

Pursuant to Federal Rule of Civil Procedure 33 and the agreement of the parties, plaintiff Tom Rider offers the following objections and responses to Defendants' First Set of Document Requests to him.

DEFINITION

1. As used herein, "irrelevant" means not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

GENERAL OBJECTIONS

1. Mr. Rider's general objections, as set forth herein, are to be considered continuing objections and responses to the specific Interrogatories that follow, even if not referred to in the objection and response to a specific Interrogatory. Mr. Rider's objections and responses given herein shall not be construed to waive or preclude any objections he may later assert.

2. Mr. Rider objects to each Definition and Instruction and each Document Request to the extent that it is vague, ambiguous, overly broad, unduly burdensome, or seek irrelevant information.

3. Mr. Rider objects to each Definition and Instruction and each Document Request to the extent that it seeks to impose obligations on plaintiffs beyond the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

4. Mr. Rider objects to each Definition and Instruction and each Document Request to the extent that it seeks information protected against disclosure by the attorney-client privilege, the work-product doctrine, or any other privilege, immunity, doctrine, or rule of confidentiality. Mr. Rider further objects to each Definition and Instruction, and each Document Request, to the extent it seeks disclosure of information that would violate any of the privacy or other rights of individuals or himself.

5. In responding to these Document Requests, Mr. Rider does not waive the foregoing objections or the specific objections that are set forth in the responses to particular requests. In addition, Mr. Rider does not concede by responding that the information sought or produced is relevant to the subject matter of this action or is calculated to lead to the discovery of admissible evidence. Mr. Rider expressly reserves the right to object to further discovery into the subject matter of these Document Requests and the right to object to the introduction into evidence of any of the information provided in response to the Document Requests.

6. Although Mr Rider has exercised due diligence in responding to the Document Requests, he reserves the right to amend or supplement his responses and objections to the Document Requests if additional responsive documents are discovered or located hereafter.

SPECIFIC OBJECTION TO INSTRUCTIONS

Mr. Rider objects to Instruction No. 10 to the extent it requires him to indicate a partial withholding on the partially withheld document itself. Instead, plaintiffs are providing the Bates numbers of partially redacted documents in plaintiffs Privilege Log, so that defendants can readily identify the documents.¹

RESPONSES AND SPECIFIC OBJECTIONS

Mr. Rider incorporates herein by reference his Definitions and General Objections with respect to each Document Request to which those objections apply, as though fully set forth therein, and no specific objection or response is intended or shall be construed to waive any of those objections. Subject to and without waiving those objections, Mr. Rider responds to defendants' Document Requests as set forth below.

DOCUMENT REQUESTS

Document Request No. 1:

All documents that refer, reflect, or relate to defendants' treatment of elephants, including but not limited to documents that you received while working for defendants that refer, reflect, or relate to animal care.

Objection and Response:

Mr. Rider objects to this Request on the grounds that the term "treatment" is vague and ambiguous, the Request is overly broad and unduly burdensome. Subject to and without waiving these or plaintiffs' general objections, Mr. Rider is producing documents marked TR - 00058 -

¹Documents and portions of documents for which Mr. Rider claims a privilege are listed on the privilege logs for all of the plaintiffs.

00065; TR - 00154² - 00155; TR - 00156 - 00162, and TR - 00174 - 00186. Additional responsive documents are being produced collectively by all of the plaintiffs, and are marked "PL.". The documents marked "PL." that are responsive to this document production are those that are also responsive to Document Production Request Nos. 2, 9, 12, 13, 14, 15, 16, 17, 18, 21, 22, 26, 29, 32, and 37 directed at Mr. Rider's co-plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 2

All documents and other employment records that refer, reflect, or relate to your employment by defendants or by the operators of any other circus or any other employer that presented animals as part of its business.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00003 - 00004; TR - 00058 - 00065; TR - 00156 - 00162; TR - 00162 - 00173; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 3

Any guidelines for interaction with animals that you received while you were working for defendants.

²Due to an error by the copying service, there is no document marked "TR - 000153."

Response:

In response to this request, Mr. Rider is producing a document marked TR - 00002.

Document Request No. 4

All documents that refer, reflect, or relate to any training you have received in the treatment of animals in captivity, including, without limitation, elephants.

Response:

In response to this request, Mr. Rider is producing a document marked TR - 00002.

Document Request No. 5

All documents that refer, reflect, or relate to any complaint or report by you or any person acting on your behalf to any supervisor or other employee of defendants which you made while working for defendants or following your employment by defendants relating to the treatment of elephants by defendants or any of defendants' current or former employees.

Objection and Response:

Plaintiffs object to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Rider's general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; and TR - 00156 - 00162. Additional responsive documents are being produced collectively by plaintiffs, and are marked PL - 06973 - 06980, and are hereby incorporated by reference.

Document Request No. 6:

All documents that refer, reflect, or relate to your leaving defendants' employ, including documents describing the circumstances of your departure, any communications you had with any person about the departure, or any documents that memorialize or address your reasons for leaving defendants' employment.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider states that, other than documents that are covered by the attorney-client privilege, he has no documents that are responsive to this request.

Document Request No. 7

All documents that refer, reflect, or relate to your employment by Chipperfields Circus ("Chipperfields"), including without limitation:

- a) All documents that refer, reflect, or relate to your travel to Europe with Chipperfields.
- b) Any documents you received while in the employ of Chipperfields that refer, reflect, or relate to animal care and/or guidelines for interactions with animals.
- c) All documents that refer, reflect, or relate to any complaint or report by you or any other person acting on your behalf to any supervisor of other employee while you worked for Chipperfields or after you left the employment of Chipperfields referring, reflecting, or relating to the treatment of, handling of, care for, and/or training of elephants.
- d) All documents that refer, reflect or relate to your leaving the employ of Chipperfields, including documents describing the circumstances of your departure, any communications you had with any person about the departure, or any documents that memorialize or address your reasons for leaving Chipperfields.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider states that he has no documents that are responsive to this request.

Document Request No. 8:

All documents that refer, reflect, or relate to any litigation or any adverse proceedings between you and Chipperfields or any person affiliated with Chipperfields, including any correspondence relating to such litigation of any pleadings or other documents from such litigation.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider states that he has no documents that are responsive to this request.

Document Request No. 9:

All documents that refer, reflect, or relate to your return to the United States following your employment with Chipperfields, including documents that refer, reflect, or relate to the means in which you traveled and the source of the funds used to pay for that travel.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider states that he has no documents that are responsive to this request.

Document Request No. 10:

All newspaper, magazine, or other articles, or videotapes or audiotapes of interviews, speeches, or discussions in which you are quoted or mentioned, including without limitation, articles, videotapes, or audiotapes from domestic and foreign newspapers, magazines, television programs, and/or radio programs.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00005 - 00057. Additional responsive documents are being produced collectively by plaintiffs.

See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 11

All documents that purport to memorialize any events alleged in the notice of intent to sue letters or that refer, reflect, or relate to those alleged events.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents.

Those documents are hereby incorporated by reference.

Document Request No. 12:

All documents that refer, reflect, or relate to allegations in the complaint of defendants harming elephants; to elephants being harmed; or to defendants keeping elephants "confined" or "in chains each day, for most of the day," including, without limitation, any documents that refer, reflect, or relate to any "physical discomfort, behavioral stress, and severe psychological harm" caused by such conduct.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 13:

All documents that refer, reflect, or relate to defendants having "taken" an elephant within the meaning of the Endangered Species Act.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 14:

All documents that describe, purport to memorialize, or refer, reflect, or relate to any of the alleged events or facts as set forth in the complaint relating to elephants' "stereotypic" behavior or any such alleged behavior by defendants' elephants, including but not limited to documents documenting such behavior, documents that refer, reflect, or relate to the reasons for such behavior, and/or documents describing such behavior.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 15:

All documents that refer, reflect, or relate to the death of Benjamin, including without limitation all documents relating to the causes of Benjamin's death and any alleged "routine beatings" of Benjamin as are alleged in the complaint.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162. Additional responsive documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, including, but not limited to PL - 02804-03069; PL - 03070-03215; and PL - 05118, Chapter V. All of those documents are hereby incorporated by reference.

Document Request No. 16:

All documents that refer, reflect, or relate to defendants' separation of juvenile elephants from their mothers, including without limitation any documents that refer, reflect, or relate to allegations in the complaint of defendants "forcibly remov[ing] baby elephants from their mothers with the use of ropes and chains," defendants' intent to "establish dominance and

control over the baby elephants” through the separation process, or any alleged injuries suffered by Doc, Angelica, or any other elephant during the process of being separated from its mother.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders’ general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs’ Responses to Defendants’ Request for the Production of Documents, including, but not limited to PL - 03846-04152; PL - 05118, Chapter IV. All of those documents are hereby incorporated by reference.

Document Request No. 17:

All documents that refer, reflect, or relate to the death of Kenny, including without limitation any documents that refer, reflect, or relate to allegations in the complaint of “Ringling Bros. ma[king] Kenny perform on the day that he died, even though it knew that he was ill” and any documents that refer, reflect, or relate to Kenny allegedly being “routinely beaten and hit by Ringling Bros.”

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders’ general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs’ Responses to Defendants’ Request for the Production of Documents, including, but not limited to PL - 0510 - 01751; PL - 05118, Chapter II. All of those documents are hereby incorporated by reference.

Document Request No. 18:

All documents that refer, reflect, or relate to any communications between you and any federal, state, or local government agency or official regarding any circus including, but not limited to, Ringling Bros. and Barnum & Bailey Circus.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Rider's general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156-00162. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 19:

All documents that refer, reflect, or relate to any communications you have had with defendants or any current or former employee of defendants since your employment by defendants ended.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, and calls for the production of irrelevant documents. Subject to and without waiving these or Mr. Rider's general objections, Mr. Rider states that he has no documents that are responsive to this request.

Document Request No. 20:

Bank statements or other documents demonstrating your sources of income since you stopped working in the "circus community."

Objection and Response:

Mr. Rider objects to this Document Production Request on the ground that it seeks information that is irrelevant, oppressive, and on the grounds that the Request is vexatious. Mr. Rider further objects to this Request on the ground that it seeks privileged information that is protected by his right to privacy. Subject to and without waiving the foregoing or general

objections to these Requests, and subject to a confidentiality agreement, Mr. Rider would be willing to provide defendants with information that would identify his sources of income since he stopped working in the "circus community."

Document Request No. 21:

All documents that refer, reflect, or relate to any payments of gifts in money or goods made by any animal advocates or animal advocacy organizations to you including but not limited to any payment of your transportation expenses, hotel bills, or food, or other costs of living by any animal advocates or animal advocacy organizations.

Objection and Response:

Mr. Rider objects to this Document Production Request on the grounds that it seeks information that is irrelevant, oppressive, and on the grounds that it the Request is vexatious. Mr. Rider further objects to this Request on the ground that it seeks privileged information that is protected by his right to privacy, and would infringe on his freedom of association. Subject to and without waiving the foregoing or general objections to these Requests, and subject to a confidentiality agreement, Mr. Rider would be willing to provide defendants with information that is responsive to this Request.

Document Request No. 22:

All documents that refer, reflect, or relate to any communication between you and any animal advocates or any person affiliated with such a group, including but not limited to communications while you were working for the Chipperfields or after you left the employ of the Chipperfields but before you returned to the United States.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive, and seeks irrelevant information. Mr. Rider further objects to this Request on the grounds that it seeks privileged information that is protected by the attorney-client

privilege, with respect to documents that reflect communications he has had with the co-plaintiffs, that one or more of his attorneys participated in, and with respect to communications he has had with Lisa Weisberg who is an attorney with the ASPCA, one of the organizational plaintiffs in this action. Mr. Rider further objects to this Request on the ground that it seeks privileged information that is protected by his right of association, because it would require him to reveal the animal advocates or animal advocacy groups with which he has communicated. Subject to and without waiving the foregoing or general objections to these Requests, in response to this request, Mr. Rider is producing a document marked TR - 00001. Additional responsive documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 23:

All publications, newsletters, pamphlets, letters, and other communications that you have received from any animal advocates regarding the presentation of elephants in circuses, treatment of elephants by circuses, training of elephants, conditions of elephants in the wild and/or in captivity, and the general health and/or well-being of elephants in the care of defendants or any other circus.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive, and seeks irrelevant information. Mr. Rider further objects to this Request on the grounds that it seeks privileged information that is protected by the attorney-client privilege, with respect to documents that reflect communications he has had with the co-plaintiffs, that one or more of his attorneys participated in, and with respect to communications he has had with Lisa Weisberg who is an attorney with the ASPCA, one of the organizational

plaintiffs in this action. Mr. Rider further objects to this Request on the ground that it seeks privileged information that is protected by his right of association, because it would require him to reveal the animal advocates or animal advocacy groups with which he has communicated. Subject to and without waiving the foregoing or general objections to these Requests, in response to this request, Mr. Rider is producing documents marked TR - 00066 - 00152. Additional responsive documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 24:

All documents that refer, reflect, or relate to any membership you have ever had, or financial or other contribution you have ever made, to any animal advocacy organization.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome, that the term "other contribution" is vague, and that the request seeks irrelevant information and would invade his personal privacy and right of association. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider states that he has no such documents.

Document Request No. 25:

All documents that refer, reflect, or relate to any public statements, including without limitation statements that you have made for any press medium, that concern treatment of animals by defendants or any other circus.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 26:

All documents in your possession that refer, reflect, or relate to the treatment of elephants in captivity, including but not limited to American Zoological Association Guidelines; Guidelines issued by other circuses or organizations, including any animal advocates; U.S. Department of Agriculture elephant training guidelines; and any correspondence about the same.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00058 - 00065; TR - 00156 - 00162; and TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs. See Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents. Those documents are hereby incorporated by reference.

Document Request No. 27:

Any documents that refer, reflect, or relate to elephant behavior and/or physiology, whether of elephants in captivity, in the wild, or both.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00174 - 00186. Additional responsive documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 28:

All documents that refer, reflect, or relate to the presence of tuberculosis in circus elephants.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 29:

All documents that refer, reflect, or relate to legislative bans on the presentation of animals in circuses in U.S. and foreign jurisdictions, including without limitation legislation and proposed legislation, correspondence, and speeches or testimony regarding such legislation.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, Mr. Rider is producing documents marked TR - 00187 - 00190. Additional responsive documents are

being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 30:

Any fact sheets that refer, reflect, or relate to the presentation of and/or treatment of elephants in circuses, and any documents or records underlying or associated with those fact sheets.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 31:

Any other correspondence or other documents expressing support for or opposition to the presentation of elephants in circuses, including but not limited to speeches, articles, letters to the editor, and Internet postings.

Objection and Response:

Mr. Rider objects to this Request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these or Mr. Riders' general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 32:

All documents not otherwise responsive to an earlier request that refer, reflect, or relate to any complaint or report you have made about defendants or any criticism you have made of defendants.

Response:

Mr. Rider has no documents that are responsive to this request.

Document Request No. 33:

All documents referenced in plaintiffs' Initial Disclosures not covered by an earlier request.

Response:

Subject to and without waiving Mr. Riders' general objections, all such documents are being produced collectively by plaintiffs, see Addendum to Plaintiffs' Responses to Defendants' Request for the Production of Documents, and are hereby incorporated by reference.

Document Request No. 34:

All documents not covered by an earlier request that refer, reflect, or relate to any person identified in your Initial Disclosures as likely to have discoverable information that you may use to support your claims in this case.

Objection and Response:

Mr. Rider objects to this Request on the ground that it would reveal the work product of his attorneys. Subject to and without waiving this or Mr. Riders' general objections, Mr. Rider states that he has no documents that are responsive to this request.


Document Request No. 35:

All documents considered or relied upon in answering any of defendants' interrogatories or requests for admission.

Objection and Response:

Mr. Rider objects to this Request on the ground that it calls for the production of documents that are covered by the attorney-client communication and the his attorneys' work product privilege. Subject to and without waiving this or Mr. Riders' general objections, Mr. Rider states that he relied on the documents referenced above.

Submitted by:


Katherine A. Meyer
(D.C. Bar No. 244301)
Kimberly D. Ockene
(D.C. Bar No. 461191)

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