

**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 20

TO

**MEMORANDUM OF POINTS AND AUTHORITIES IN
SUPPORT OF FEI'S MOTION TO COMPEL
DISCOVERY FROM PLAINTIFF TOM RIDER
AND FOR SANCTIONS, INCLUDING DISMISSAL**

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.

Civ. No. 03-2006 (EGS)

**PLAINTIFF TOM RIDER'S SUPPLEMENTAL RESPONSES
TO DEFENDANTS' FIRST SET OF INTERROGATORIES**

DEFINITIONS AND OBJECTIONS

1. Mr. Rider hereby incorporates by reference the definitions and general and specific objections that he made in his Objections and Responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider.

SUPPLEMENTAL RESPONSES

Interrogatory No. 1:

Describe each and every job or volunteer position you have held with defendants.

Supplemental Response to Interrogatory No. 1:

Mr. Rider has nothing to add to his original response to this Interrogatory.

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Supplemental Response to Interrogatory No. 2:

Subject to and without waiving his previous objections to these Interrogatories, Mr. Rider states that before he completed high school he joined the military when he was 17 years old during the Vietnam War, and that he obtained his GED while he was in the military. Mr. Rider regards any further details concerning his military service to be extremely personal and, accordingly, he previously agreed to provide defendants with such information subject to a confidentiality agreement that would protect his personal privacy. However, because defendants have refused to agree to such an agreement, Mr. Rider has moved the Court to enter a protective order regarding this matter.

Although Mr. Rider does not consider his public education advocacy for the Wildlife Advocacy Project to be a "job," he nevertheless states, as he also testified about in his October 12, 2006 deposition, that he has received grants from that organization for his travel, living, and other expenses in connection with public education, media, and general advocacy work that he is doing on behalf of captive elephants. This effort includes contacting and speaking to journalists and others about the treatment of elephants in circuses, including the Ringling Bros. Circus, speaking to and assisting grassroots groups who are working on this and similar issues, and speaking to and testifying before federal, state, and local legislative entities about such matters. In furtherance of this effort, Mr. Rider travels throughout the country to the cities where the Ringling Bros. Circus performs and elsewhere.

Interrogatory No. 3:

Describe any training or experience you have in the treatment of Asian elephants, including but not limited to the use of an ankus or tethering Asian elephants, and describe that training or

experience, including the employer that required you to take such training, if any.

Supplemental Response to Interrogatory No. 3:

Mr. Rider has nothing to add to his original response to this Interrogatory.

Interrogatory No. 4:

Describe every communication you have had regarding defendants with any and all animal advocates or animal advocacy groups prior to working for defendants, while working for defendants, or since leaving defendants' employment.

Supplemental Response to Interrogatory No. 4:

Mr. Rider objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks irrelevant information, and is not reasonably calculated to lead to the discovery of admissible evidence, and is being asked for the purpose of harassing him. Subject to and without waiving the foregoing or previous objections to these Interrogatories, Mr. Rider supplements his answer to this Interrogatory as follows:

During 2002-2003, I had regular conversations with Lisa Weisberg of the American Society for the Prevention of Cruelty to Animals (ASPCA) concerning my media and public education advocacy on behalf of captive elephants. Those conversations included which reporters I was meeting with in which city, the substance of my media interviews, discussions about which city I would go to next and which reporters to talk to, and any subsequent news coverage that was generated. I may also have had conversations with her concerning other advocacy work I was doing on behalf of elephants, such as testifying at hearings on various legislative proposals or speaking to grassroots groups. I also had conversations with other individuals in the ASPCA's media office, including Brigid Fitzgerald, Patricia Jones, and Robin Walker about these same matters during the same time period.

I also had conversations with D'Arcy Kemnitz of the Wildlife Advocacy Project between March 2001 and February 2002, and with Katherine Meyer of the Wildlife Advocacy Project between March 2001 and June 2004 about these same matters and other public education outreach I was doing on the issue of elephants in circuses with grassroots groups around the country.

In January 2006 I spoke to an animal rights group in Florida called "ARF" about the abuse and mistreatment of animals I witnessed when I worked at Ringling Bros., and I also attended a press conference with that group in Florida. In February 2005, I also talked to a group of people in Atlanta, Georgia about these same matters. During Memorial Day weekend in 2005 and 2006 I spoke with Virginia Wolfe and others of the Lehigh Valley Animal Rights group in Harrisburg, Pennsylvania. In October 2005 I spoke to a woman in Westminister, New York who asked me to speak to the City Council there about the abuse I saw when I worked at Ringling.

I also spoke to Karen Laski with a Hartford Connecticut group in May and October of 2005 and 2006, and some individuals at a rally that took place there, whose first names I know (Rob, Nancy, Sue), but I do not know their last names. I spoke to Senator Robert Hedlund in Boston, Massachusetts in October 2005, and did a radio talk show with him, and also attended a press conference with him during that time in Boston. In Manchester, New Hampshire, in October 2004, 2005, and 2006, I spoke to Linda Dionne of the New Hampshire Animal Rights group, and in October 2004 I was on a local television show with her concerning the mistreatment of animals in circuses. In October 2004 and 2005 I also attended demonstrations with animal advocates in Manchester New Hampshire. During October 4-6, 2006, I attended a conference held by a group called "EARS" in Hollenwald, Tennessee, and I spoke about this

lawsuit and the abuse of the elephants I saw when I worked at Ringling. At that same conference I saw Carol Buckley of The Elephant Sanctuary and I introduced myself and said hello to her.

In February 2005, I spoke to Senators Marion Price and Ernie Chambers in Omaha Nebraska and some local people when I testified in support of a bill that was pending there. In February 2005, I also spoke to RaeLeann Smith of PETA in Omaha Nebraska about legislation that was pending there, and she asked me if I would go to Chicago in March to speak to the City Council about another bill that was pending there. In March 2006 I went to Chicago and spoke to the City Council and I believe I spoke to Ms. Smith there as well. I also talked to Debbie Leahy of PETA by phone during the summer of 2006 to ask her if I could use some video footage that PETA had taken in Greenville, South Carolina, and she said no. I believe I also had a short conversation with Ms. Leahy in Chicago when I was there in March 2006, just to say hello.

In the summer of 2005, I spoke to Mike Markarian of the Fund for Animals in Denver Colorado in connection with a press conference that was held on the steps of City Hall about a bill that was pending there, and I had at least one conversation with him or someone on his staff about the logistics of getting to that press conference. In Denver I also spoke to the 15-year old girl who wrote the Denver Initiative, who also attended the press conference.

In the spring of 2006, I did a radio talk show in Las Vegas Nevada with a local animal advocate named Linda Faso. In December 2004, I spoke to Chris DeRose of The Last Chance for Animals in Los Angeles California and spoke at a press conference with him there about Ringling Bros.' mistreatment of the elephants. In August 2004, 2005, and 2006, I spoke to people who were demonstrating against the circus in San Diego, California, including Pat Cuiello and Deniz Bolbo, and in August 2006 I also went with them to see the Ringling train

arrive in San Diego, and we talked about the fact that the elephants were on chains without any firehose around the chains and that the elephants were completely unsupervised by anyone.

I attended a press conference with the Animal Protection Institute on September 22, 2005 on the steps of the Capitol in Sacramento, California concerning a bill that was pending there, and I had a conversation with Nicole Paquette, Emily Claremont, Michelle Thew, and a woman named Zibby, all of whom worked for API, about the logistics of the press conference. I also spoke to Tracy Silverman of AWI who also attended the press conference and we talked about the press conference and what I witnessed when I worked at Ringling Bros.

On July 21, 2005, I spoke to Wayne Pacelle of the Humane Society of the United States (HSUS) at a benefit that was held near Los Angeles California to help rescue the Ringling Bros. elephants; I said hello to him and thanked him for coming to the benefit, and he thanked me for speaking out against the abuse and mistreatment of elephants. At the same event, I also talked to Gretchen Wyler and a woman named Sue who worked for HSUS, and told them of some of the things I witnessed when I worked at Ringling. At the same event I also said hello to Pat Cuvillo and Deniz Bolbo. I also talked to Tracy Silverman of the Animal Welfare Institute at that event about my experiences at Ringling and about my travels around the country.

Sometime in September or October 2004 I spoke to a woman with the Rocky Mountain Animal Defense group in Boulder Colorado and I attended a demonstration against the circus there and was interviewed by a reporter for Fox Channel 4.

Since June, 2004, I have also had conversations with the various plaintiff organizations and our lawyers about legal strategies in this case, the evidence that plaintiffs may rely on, and the status of the litigation, all of which are protected by the attorney-client and attorney work

product privileges. I have also had conversations with some of the other plaintiffs about their legislative and media strategies for halting the abuse and mistreatment of circus elephants and educating the public about this issue. Additional details of such conversations are irrelevant and their disclosure would impose an undue burden on me and the other plaintiffs and infringe upon my and the other plaintiffs' First Amendment rights of association and expression. I have also had conversations with Katherine Meyer in her capacity as an official of the Wildlife Advocacy Project concerning my media and public education work for the Wildlife Advocacy Project, including which journalists, grass roots groups, or legislative bodies I am talking to or plan to talk to about these matters.

I have spoken to other groups and individuals around the country whose names I do not know about the mistreatment of the elephants that I saw at Ringling Bros. and sometimes about this lawsuit. More information about which groups I have spoken to can be found by going to the Yahoo search engine on the internet and typing in "tom rider elephants."

Interrogatory No. 5:

Describe every communication you have had regarding defendants with any members of the press or at any lectures, conferences, or seminars.

Supplemental Response to Interrogatory No. 5:

Mr. Rider objects to this Interrogatory on the ground that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and being asked for the purpose of harassing and intimidating him. Mr. Rider further objects to this Interrogatory on the ground that it invades his right to privacy, and freedom of association. Subject to and without waiving the foregoing or general objections to these Interrogatories, Mr.

Rider supplements his answer to this Interrogatory as follows:

In 2004 I talked to reporters for NBC in Tampa Florida, and the Telemundo station in Miami, Florida. In 2005 I talked to reporters for Channel 2 in Orlando, Florida; CNN in Atlanta, Georgia and Channel 5 NBC in Atlanta; in Norfolk, Virginia I spoke to reporters for NBC and Fox news; in Washington, D.C. I spoke to a reporter for National Geographic Online; in Hartford, Connecticut, I spoke to reporters for Fox and NBC news; in Boston Massachusetts I spoke to a reporter for the Boston Herald and also did a radio talk show with Senator Robert Hedlund; in Los Angeles, California I spoke to reporters with NBC, Fox, CBS, Telemundo, KCAL 9, LA Times, and two radio programs (I don't know their names); in San Diego, California I talked to reporters for Fox TV; in Oakland, California I talked to Leslie Griffith of Channel 2; in Hartford, Connecticut I spoke to a reporter at the Boston Herald, and also spoke to a state senator about the abuse I witnessed at Ringling; in Manchester, New Hampshire I was on a public TV show for PBS; in Hartford, Connecticut I spoke to reporters for NBC and Fox; in Bridgeport Connecticut I was interviewed by a local college paper and also spoke on a radio show.

In November 2006, I spoke to Jennifer Santiago at CBS in Miami Florida, and during that same time I also spoke to Sally Shulze at Channel 2 in Orlando, Florida; I spoke to a reporter at CNN in Atlanta, Georgia; In Norfolk, Va. I spoke to reporters for ABC and NBC; in Omaha, Nebraska, I spoke to a state senator and reporters for Omaha Fox TV; in Chicago, Illinois I spoke to the City Council and to a reporter for ABC Channel 7; in Boston, Massachusetts I spoke at a press conference with Senator Hedlund; in Hartford, Connecticut I spoke to a reporter for Fox TV; in Harrisburg, Pennsylvania I spoke to a reporter for a local paper called The Patriot and a

reporter for NBC; in Lincoln, Nebraska I spoke to a reporter for Fox TV; in Las Vegas, Nevada I spoke to a journalist with National Public Radio; in San Diego, California I spoke to a reporter for Fox TV; in Oakland, California I spoke to Leslie Griffith with Channel 2; in Omaha, Nebraska I spoke to a reporter for Fox TV; in Bridgeport, Connecticut I spoke to a reporter for Fox TV; in Chicago, Illinois, I spoke to a reporter for Channel 7; in Pittsburgh, Pennsylvania I spoke to a reporter for ABC channel 4; in Miami, Florida I spoke to Jennifer Santiago with CBS; in Orlando, Florida I spoke to a reporter for Channel 2.

With respect to all of these conversations, I discussed the treatment of the elephants that I witnessed when I worked at Ringling Bros., as I have previously described in great detail in response to these Interrogatories. I also hereby incorporate my supplemental answer to Interrogatory No. 4. Additional information concerning communications I have had with the press and others can be found by going to the Yahoo search engine on the internet and typing in "tom rider elephants."

Interrogatory No. 6:

State whether you have ever been arrested for, charged with, or convicted of a crime. If you have been arrested for, charged with, or convicted of a crime, for each arrest, charge, or conviction, describe the incident for which you were arrested, charged, or convicted and provide the jurisdiction of the arrest, charge, or conviction, and/or plea; the offense(s) for which you were arrested and/or charged; the offense(s) to which you pled guilty or of which you were convicted; the disposition of any other charges against you; the sentence, incarceration, or other form of punishment imposed on you; and the date of each arrest, conviction, plea, punishment, incarceration, or other disposition.

Supplemental Response to Interrogatory No. 6:

Mr. Rider has nothing to add to his original response to this Interrogatory.

Interrogatory No. 7:

Identify any civil litigation to which you have been a party or have testified, whether in the United States or abroad, including without limitation the parties to the case, the attorneys who represented any of the parties, whether you were a plaintiff or a defendant, the jurisdiction in which the case was filed, the causes of action asserted in the case, the allegations in the case, and the disposition of the case.

Supplemental Objection and Response to Interrogatory No. 7:

The only other civil litigation that I have been involved in concerns certain marital disputes I had with my ex-wife. These matters are completely irrelevant to this lawsuit, and further discussion of these matters would invade my personal privacy and the privacy of my family, and be unduly burdensome and oppressive. Accordingly, I have objected to providing further information about these matters and have sought a protective order from the Court concerning these matters.

Interrogatory No. 8:

Identify any person who you or the other plaintiffs expect to call as a witness in this case, and state the subject and substance of their expected testimony.

Supplemental Response to Interrogatory No. 8:

Subject to and without waiving the general objections to these Interrogatories, Mr. Rider supplements his answer to this Interrogatory by stating that plaintiffs also expect to rely on incidents recounted by Mr. Rider in these supplemental interrogatory responses and in deposition testimony he provided on October 12, 2006. He will also rely on the testimony provided by Frank Hagan at his deposition on November 9, 2004, which is hereby incorporated by reference, and the deposition testimony provided by Gerald Ramos on January 24, 2007, which is also incorporated by reference.

Subject to an agreement with defendants, Mr. Rider is not yet required to identify any expert witnesses that he may call as a witness in the case.

Interrogatory No. 9:

State the date on which you first became aware of defendants' alleged mistreatment of Benjamin, and describe each incident thereafter in which you contend that Benjamin was mistreated.

Supplemental Response to Interrogatory No. 9:

Mr. Rider has nothing to add to his original response to this Interrogatory.

Interrogatory No. 10:

State the date on which you first became aware of defendants' alleged mistreatment of Kenny, and describe each incident in which you contend that Kenny was mistreated.

Supplemental Response to Interrogatory No. 10:

Mr. Rider has nothing to add to his original response to this Interrogatory.

Interrogatory No. 11:

State the date on which you first became aware that defendants allegedly harmed their elephants, as is alleged in the complaint, and describe each incident thereafter in which you contend that defendants harmed one or more of their elephants.

Supplemental Response to Interrogatory No. 11:

Subject to and without waiving his previous objections to these Interrogatories, Mr. Rider supplements his answer to this Interrogatory by stating as follows.

Additional incidents include, but are not limited to, the additional incidents that I included in my October 12, 2006 deposition testimony. In addition, in San Diego at the end of

July or first part of August 2004, I saw elephants on chains at the arena parking lot; in September 2004, in San Francisco, California, I watched the train come in and saw elephants swaying and chained up, and I knew they had to be chained for the entire trip from San Diego to San Francisco, and I saw a lot of hooking of the elephants with bullhooks as they were being taken off the train in San Francisco. In Manchester New Hampshire in October 2004 I saw elephants on chains for hours in the parking lot and I saw an older man hit the elephants with a cane.

In Washington, D.C. in 2005, I saw the train come in and knew from my experience that the elephants had been chained on the train for a very long time. In Los Angeles California in July 2004 and 2005, I also saw elephants on the train and knew that they had been chained for a long time, unable to turn around for a long time on that train, and that it was also very hot in the desert. In San Diego in August 2004 and 2005, I saw elephants chained in tents and I know from my time there that they were on chains for many hours. In San Francisco in September 2005 I watched the train come in and saw the elephants on chains and knew they had been on chains for a day and a half. In October 2004 and 2005 in Boston Massachusetts I saw the elephants in the arena where they stay on chains all the time inside other than when they are rehearsing or performing, just like when they are in New York City, where they stay inside Madison Square Garden on chains for 4-5 days in a row. In Manchester New Hampshire in October 2005 I watched elephants on chains from approximately 11:00 a.m. until 8:00 p.m., and then they were taken to the train and chained again and I saw a Ringling Bros. employee hook an elephant under the trunk and he pulled its head to him with the hook and the elephant squealed.

Frank Hagan also witnessed the routine mistreatment of the elephants when he worked at Ringling Brothers, from March, 2000-July, 2004 and during 1993-2000, and I hereby incorporate

by reference Mr. Hagan's video deposition testimony that was provided on November 9, 2004. Gerald Ramos also witnessed the mistreatment of elephants when he worked at Ringling Bros. in August 2006, and Mr. Rider hereby incorporates by reference Mr. Ramos' video deposition testimony that was provided on January 24, 2007.

Archele Faye Hundley also witnessed the mistreatment of the elephants while she worked on the Red Unit from April of 2006 to June of 2006. While employed by Ringling Brothers she routinely witnessed elephants being struck with bull hooks. During a two week layover in Tulsa, Oklahoma between May 25, 2006 and June 6, 2006, Ms. Hundley witnessed Sasha Houcke repeatedly strike the elephant named Baby with a bull hook behind her ear and on the leg, and after hooking the elephant behind the ear, pulling with the weight of his entire body on the imbedded hook. Robert Tom, Jr. also witnessed the mistreatment of the elephants while he was employed as an animal handler by Ringling Brothers on the Red Unit from the spring of 2004 until August 6, 2006. Mr. Tom witnessed Ringling Brothers employees striking the elephants with bull hooks behind their ears, on their legs, and on their trunks.

Mr. Rider also incorporates by reference documents that plaintiffs have received from defendants that are responsive, which include but are not limited to: FELD 002333, 0004309, FEI 15024, 15025-27, 16649, 16648, 16615-17, 170303, 17212, 17214, 17221, 17225, 17226, 17266, 17267, 17268, 17269, 17270, 17271, 17273, 17274, 17275, 18885, 21230, 21523, 29446. Additional incidents in which Ringling employees harmed one or more of their elephants are recorded on videotapes that plaintiffs have produced to defendants in response to the defendants' document production requests. Mr. Rider incorporates by reference all of the additional incidents of handlers, trainers, and other Ringling Brothers personnel striking elephants with bull hooks,

brooms, whips, and other instruments, and keeping the elephants chained for long periods of time, as recorded on those videotapes, which include, but are not limited to: PL 07066, 07067, 07068, 07069, 07071, 07072, 07073, 07074, 07075, 07077, 07078, 07081, 07083, 07085, 07086, 070787, 07088, 07089, 07090, 07091, 08967, 08970, 08962, 08963, 08964, 08972, 08974, 08975, 08976, 08978, 08979, 08980, 08982, API 7166.

Mr. Rider also incorporates by reference videotapes produced by defendants, including videotapes relating to the births of Ricardo and Gunther, and various training scenes and performances, as well as the following videotapes, which include, but are not limited to: FELD-VID 001, 002, 006, 007, FEI 0001, 0005, 0006, 0007, 0010, 0011, 0013, 0014, 0016, 0017, 0018, 0019, 0020, 0024, 0025, 0026, 0436, 0437, 10350, 10351, 10352, 10353, 10355, 10356, 10358, 10359, 10360, 10362, 10364, 10365, 10366, 10367, 10368, 10383, 38227, 38228, 38229, 40955, 40956, 40957, 40958, 40959, 40963, 40964, 40965, 40966, 40968, 40969, 40970, 40972, 40973, 40974, 40975, 40976, 40980, 40982, 40983, 40984, 40985, 40986, 40987, 40989, 40990. In addition, Mr. Rider incorporates by reference videotapes that representatives of plaintiffs have reviewed but that have not yet been produced by defendants, and which are also responsive to this request.

Mr. Rider also incorporates by reference incidents included in the organizational plaintiffs' responses to Interrogatories 9, 13, and 15.

Interrogatory No. 12:

Describe each and every incident which you did not identify in response to the previous interrogatory in which you contend that defendants have "taken" an elephant within the meaning of the Endangered Species Act.

Supplemental Response to Interrogatory No. 12:

Mr. Rider has nothing to add to this response.

Interrogatory No. 13:

State the date on which you first became aware of any alleged injuries that you claim were suffered by any of defendants' juvenile elephants as a result of defendants' practices regarding separation of juvenile elephants from their mothers and describe each incident thereafter in which you contend that one of defendants' juvenile elephants was injured as a result of its separation from its mother.

Supplemental Response to Interrogatory No. 13:

I hereby incorporate my original answer to this Interrogatory. In addition, I Rider incorporate by reference Troy Metzler's deposition testimony concerning baby and juvenile elephants, which Mr. Metzler provided on July 25, 2006. I also incorporate by reference documents produced by defendants to plaintiffs that are also responsive to this request, including, but not limited to, the following: FEI 17212, 17214, 17218, 18885, as well as video footage produced by defendants, including, but not limited to: FELD-VID 001 006, 007; FEI 0017, 0018, 0019, 0020, 38229, 38228, 38227. I also believe that the baby elephant named Bertha was likely separated from her mother as well by Ringling Bros. Accordingly, I also rely on the following documents which I hereby incorporate by reference: FEI 17522, FEI 0019824, 0019821, 0019822, FELD 0019826-30, FELD 8073, Feld 19825, FELD 24239-41.

Interrogatory No. 14:

Describe each incident in which you allegedly observed someone harm one of defendants' elephants, as alleged in Paragraph 19 of, or elsewhere in, the complaint.

Supplemental Response to Interrogatory No. 14:

Mr. Rider hereby incorporates the same objections and response that he made with

respect to Interrogatory No. 11.

Interrogatory No. 15:

Describe each complaint or report that you made to any person about the way that the defendants' elephants were treated while you were employed by defendants.

Supplemental Response to Interrogatory No. 15:

Mr. Rider has nothing further to add in response to this Interrogatory.

Interrogatory No. 16:

Describe the extent and nature of your contact with each and every elephant with which you worked while you worked for defendants, including the dates that you worked with that elephant.

Supplemental Response to Interrogatory No. 16:

Mr. Rider has nothing further to add in response to this Interrogatory

Interrogatory No. 17:

Describe each of your "observations" of elephants that you know, as alleged in Paragraph 23 of the complaint, since you left defendants' employ, including which elephants you observed.

Supplemental Response to Interrogatory No. 17:

Mr. Rider supplements his response to this Interrogatory by referring to his deposition testimony that he provided on October 12, 2006, in which he described the times when he has been able to visit the circus and see the elephants, including elephants on the Blue Unit. In addition he states the following:

Since June 2004, I have been able to observe many of the Ringling elephants on videotape, and I hereby incorporate all of the video footage of the Blue Unit that plaintiffs have produced since June 2004, which depict such animals. In addition, in October 2006 when I learned that Sophie was no longer with Ringling, I went to see her at the Naibo Zoo in Moline

Illinois. She was no longer chained and her handler did not use a bullhook on her. She came over to where I was standing, looked at ease, and was not swaying back and forth.

Interrogatory No. 18:

For each elephant with which you claim, in Paragraph 23 of the complaint, a “close personal relationship,” describe the “demeanor and behavior” which you contend is “a result of the way [the elephants] are mistreated by Ringling Bros.”

Supplemental Response to Interrogatory No. 18:

Mr. Rider has nothing further to add to his response to this Interrogatory.

Interrogatory No. 19:

Describe each incident in which you contend that one of defendants’ elephants has been “chained” for “long periods of time, up to 20 hours a day, and longer when the elephants are traveling,” including the name of the elephant allegedly involved.

Supplemental Response to Interrogatory No. 19:

Subject to and without waiving his general and specific objections to this Interrogatory, Mr. Rider supplements his answer to this Interrogatory by incorporating by reference his supplemental response to Interrogatory 11.

Interrogatory No. 20:

Describe each incident in which you claim to have seen one of defendants’ elephants exhibiting “stereotypic behavior” as set forth in the complaint.

Supplemental Response to Interrogatory No. 20:

Subject to and without waiving the specific and general objections to these Interrogatories, Mr. Rider supplements his response by hereby incorporating his supplemental response to Interrogatory 17.

Interrogatory No. 21:

Describe every communication you have had with any current or former employee of defendants since your employment with defendants concluded.

Supplemental Response to Interrogatory No. 21:

Subject to and without waiving the specific or general objections to these Interrogatories, Mr. Rider supplements his answer to this Interrogatory as follows:

I talked to Ted White three times on the phone during 2005; and met with him in July 2004 in Palm Dale, California, and then again the first part of December 2006 in Burbank, California. Most of these conversations were about personal matters that have nothing to do with the circus, but we also talked about our days at Ringling Bros. In December 2004 I spoke to Nicole Adrian (I believe her address is still Aron Court, San Marcos, CA) in connection with a press conference by The Last Chance for Animals that was held in Los Angeles California on December 12, 2004, at which both Nicole and I spoke. We talked about personal matters and about the mistreatment of the elephants that we both witnessed when we worked at Ringling Bros., and Nicole also talked about her emotional reaction to watching the videotape that shows Benjamin drowning, and how sad it made her, because she had known Benjamin. I had two or three telephone conversations with Frank Hagan in September - October 2004, in which Mr. Hagan asked me to appear at a press conference with him, but I told him I was unavailable.

Interrogatory No. 22:

Describe every circus performance or any other activity involving the presentation of animals, including performances or activities of the Ringling Bros. and Barnum & Bailey Circus, that you viewed or witnessed since you left defendants' employ.

Supplemental Response to Interrogatory No. 22:

Subject to and without waiving the specific and general objections to these Interrogatories, Mr. Rider supplements his response by hereby incorporating his supplemental response to Interrogatory 17.

Interrogatory No. 23:

Describe each occasion since you left defendants' employ in which you have sought employment or volunteered your services to work with animals, and whether you secured the position you sought. If you did not secure the position and were given a reason for your rejection, provide that reason.

Supplemental Response to Interrogatory No. 23:

Mr. Rider has nothing further to add to his response to this Interrogatory.

Interrogatory No. 24:

Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Supplemental Response to Interrogatory No. 24:

Subject to and without waiving his previous objections to this Interrogatory, Mr. Rider hereby incorporates by reference the deposition testimony that he provided on October 12, 2006, and reiterates that he has offered to provide defendants with a complete list of information that is responsive to this Interrogatory subject to a confidentiality agreement that would protect his personal privacy.

Interrogatory No. 25:

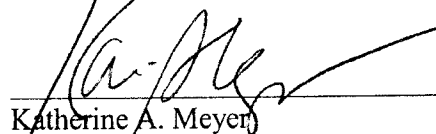
Describe the subject and substance of the testimony that would be given by

each person identified in the initial disclosures.

Supplemental Response to Interrogatory No. 25:

This information was provided by plaintiffs with their initial disclosures. The subject and substance of the testimony that I will be giving is provided in the answers to the above Interrogatories.

Objections and responses on behalf of Plaintiff by:



Katherine A. Meyer
(D.C. Bar No. 244301)
Tanya M. Sanerib
(D.C. Bar No. 473506)
Howard M. Crystal
(D.C. Bar No. 446189)

Meyer Glitzenstein & Crystal
1601 Connecticut Ave., N.W.
Suite 700
Washington, D.C. 20009
(202) 588-5206

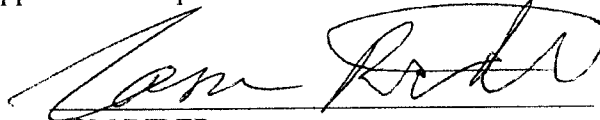
Dated: January 31, 2007

VERIFICATION

CITY OF CHARLESTON)
)
)
)
STATE OF South Carolina)

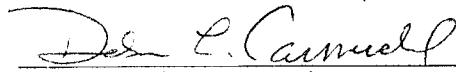
TOM RIDER, being duly sworn, says:

I am a plaintiff in this case. I have read the foregoing supplemental responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider and know the contents thereof, and, upon information and belief, said supplemental responses are true and correct.


TOM RIDER

Sworn to before me this

30th Day of January, 2007


DEBRA L. CARMICHAEL Notary Public
for State of South Carolina

My Commission Expires February 9, 2016