

**PLAINTIFFS' EXHIBIT 54**

To Plaintiffs' Opposition to Defendant Feld  
Entertainment, Inc.'s Motion for Leave to Amend  
Answers to Assert Additional Defense and Rico  
Counterclaim  
Civ. No. 03-2006 (EGS/JMF)

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1 UNITED DISTRICT COURT  
2 FOR THE THE DISTRICT OF COLUMBIA  
3 AMERICAN SOCIETY FOR THE )  
4 PREVENTION OF CRUELTY TO )  
5 ANIMALS, et al. ) Case No.  
6 Plaintiffs, ) 1:03-cv-02006  
7 -vs- ) (EGS/JMF)  
8 RINGLING BROS. AND BARNUM & )  
9 BAILEY CIRCUS, et al., )  
10 Defendant. )

**Certified Copy**

11  
12 Tuesday, July 25, 2006  
13 Washington, D.C.

14 Video Deposition of TROY J. METZLER  
15 called for examination by counsel for the  
16 Plaintiff, pursuant to notice, held at the  
17 offices of Meyer Glitzenstein & Crystal, 1601  
18 Connecticut Avenue, N.W., Washington D.C.,  
19 beginning at 9:35 a.m., before Karen N.  
20 McConnell, CSR-RMR-CRR, a notary public in and  
21 for the District of Columbia, when were present  
22 on behalf of the respective parties:

1 the terms of that contract?

2 A. Yes.

3 Q. And when you started working in 1999  
4 under your first contract with Feld  
5 Entertainment, what was your salary?

6 A. I don't recall.

7 Q. What is your salary now?

8 A. 74,000.

9 Q. \$74,000 a year?

10 A. Yes.

11 Q. And does Feld Entertainment also  
12 provide you with health insurance?

13 A. Yes.

14 Q. Does it provide you with a pension  
15 plan?

16 A. No.

17 Q. Are there any other benefits besides  
18 health insurance that you are provided with?

19 A. Housing.

20 Q. Housing. What kind of housing are you  
21 provided?

22 A. Truck and trailer.