RIDER EXHIBIT A

To Plaintiff Tom Rider's Motion for a Protective Order with Respect to Certain Financial Information
Civ. No. 03-2006 (EGS/JMF)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, *et al.*,	)	
Plaintiffs,	)	
v.	)	
	)	Civ. No. 03-02006 (EGS)
RINGLING BROTHERS AND BARNUM & BAILEY CIRCUS, *et al.*,	)	
Defendants.	)	

OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF TOM RIDER

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

DEFINITIONS

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.

for this information, which I hereby incorporate by reference.

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.

Response to Interrogatory No. 23:

None.

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.

Objection and Response to Interrogatory No. 24:

Mr. Rider objects to this interrogatory on the grounds that it seeks information that is irrelevant, oppressive, and vexatious. Mr. Rider further objects to this Interrogatory 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 Interrogatories, and subject to a confidentiality agreement, Mr. Rider would be willing to provide defendants with the answer to the first sentence of this Interrogatory.

Subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider provides the following answer to the second sentence of this interrogatory: I have not received any such compensation.

Interrogatory No. 25:

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

UNITED STATES DISTRICT COURT
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AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, *et al.*, Plaintiffs, v. RINGLING BROTHERS AND BARNUM & BAILEY CIRCUS, *et al.*, 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.

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 is 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 of 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