

RIDER EXHIBIT B

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

IN THE 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)
JUDGE: Emmet G. Sullivan

**DEFENDANTS' FIRST SET OF DOCUMENT REQUESTS
TO PLAINTIFF TOM RIDER**

Pursuant to Federal Rule of Civil Procedure 34 and the Stipulated Pre-Trial Schedule dated December 5, 2003, defendants Feld Entertainment, Inc. and Ringling Bros. and Barnum & Bailey Circus request that plaintiff Tom Rider produce, give access to, and permit the undersigned counsel for defendants to inspect and copy any and all of the materials hereinafter requested before or within thirty (30) days after the date of service of these requests, at a place to be mutually agreed upon by counsel. The following definitions and instructions should be considered in responding to these Requests.

I. DEFINITIONS AND INSTRUCTIONS

DEFINITIONS

1. "ANIMAL ADVOCATES" or "ANIMAL ADVOCACY ORGANIZATION" means any individual or organization as that term is used in plaintiffs' Initial Disclosures. The term includes but is not limited to the American Society for the Prevention of Cruelty to Animals ("ASPCA") or any local or regional Society for the Prevention of Cruelty to Animals ("SPCA"), the Fund for Animals ("FFA"), the Animal Welfare Institute ("AWI"), the People for the Ethical Treatment of Animals ("PETA"), the Performing Animal Welfare Society ("PAWS"), the Earth Liberation Front ("ELF"), the Animal Liberation Front ("ALF"), Animal Protection Institute ("API"), the Captive Animals' Protection Society ("CAPS"), In Defense of Animals ("IDA"), and Compassion over Killing.
2. "COMMUNICATION" means the transmittal or exchange of information of any kind in any form, including oral, written, or electronic form.
3. "COMPLAINT" refers to the complaint filed by the ASPCA, AWI, FFA, and Tom Rider in the above-captioned matter, dated September 23, 2003.
4. "DEFENDANTS" refers to Feld Entertainment, Inc. and the Ringling Bros. and Barnum & Bailey Circus.
5. "DOCUMENT" should be interpreted in the broadest sense permitted by the Federal Rules of Civil Procedure, and includes, but is not limited to, writings (whether handwritten or typed), letters, transcripts, speeches, drafts, facsimiles, reports, calendars, correspondence, minutes, drawings, graphs, charts, receipts, invoices, ledger entries, photographs, audio recordings, videotapes, e-mails, and other data compilations from which

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AMERICAN SOCIETY FOR THE	:	
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	:	
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	:	JUDGE: Emmet G. Sullivan
RINGLING BROS. AND BARNUM &	:	
BAILEY CIRCUS, et al.,	:	
	:	
Defendants.	:	
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**DEFENDANTS' FIRST SET OF INTERROGATORIES
TO PLAINTIFF TOM RIDER**

Pursuant to Federal Rule of Civil Procedure 33 and the Stipulated Pre-Trial Schedule dated December 5, 2003, defendants Feld Entertainment, Inc. and Ringling Bros. and Barnum & Bailey Circus hereby propound the following first set of interrogatories to plaintiff Tom Rider. Plaintiff is requested to respond to these interrogatories within thirty (30) days after the date of service of these interrogatories, in accordance with Federal Rule of Civil Procedure 33(b)(3).

I. DEFINITIONS AND INSTRUCTIONS

Defendants incorporate by reference, as if fully set forth herein, the Definitions and Instructions set forth in defendants' First Set of Document Requests to Plaintiff Tom Rider. In addition, the following definitions and instructions should be considered in responding to these interrogatories.

DEFINITIONS

1. "Describe" means (1) when used in reference to any communication, complaint, or report, to state the date and location of the communication, complaint, or report, to identify each person who spoke, complained, reported, or otherwise communicated, to identify each person who heard the communication or to whom the communication was addressed or directed, to state the substance of the communication, complaint, or report, and to state any response received; (2) when used in reference to any event or incident other than a communication, complaint, or report, to state the date and location of the event or incident, to identify all people present at or involved in the event or incident, to state what occurred, and to state the source of your knowledge; and (3) when used in reference to a job or employment, to state the position you held and your responsibilities, to provide the dates that you held the position, to identify your employer and each of your immediate supervisors, to state whether you left voluntarily or involuntarily, and to state the reason you decided to leave or the reason you were asked to leave.

2. "Identify" means (1) when used in reference to a natural person, to state his or her name, any former or stage names, job title, and present or last known residence and business address and telephone numbers; (2) when used in reference to a person other than a natural person, to state the entity's name, address, and principal business telephone