

RIDER EXHIBIT D

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

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF COLUMBIA

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4 AMERICAN SOCIETY FOR THE PREVENTION :
OF CRUELTY TO ANIMALS, et al., :

5 Plaintiffs, : Civ. No.
v. : 03-02006

6 RINGLING BROTHERS AND BARNUM & BAILEY : (EGS)
CIRCUS, et al., :

7 Defendants. :

8 - - - - - X

9 Washington, D.C.

Certified Copy

10 Thursday, October 12, 2006

11 Videotaped deposition of TOM E. RIDER, called
12 for examination by counsel for the Plaintiffs in the
13 above-entitled matter, pursuant to notice, the witness
14 being duly sworn by CARLA L. ANDREWS, a Notary Public
15 in and for the District of Columbia, taken at the
16 offices of Meyer, Glitzenstein & Crystal at 1601
17 Connecticut Avenue, Northwest, Suite 700, Washington,
18 D.C. 20009-1056, at 9:27 a.m., Thursday, October 12,
19 2006, and the proceedings being taken down by Stenotype
20 by CARLA L. ANDREWS and transcribed under her
21 direction.

22

1 Q So it is a wash. Is that what you were
2 saying?

3 A No. I am just saying that I -- no, I haven't
4 filed. It is a grant.

5 Q But when you subtract your expenses, is there
6 anything left over?

7 A No, no.

8 Q And I want to focus on the period since 2001.

9 A Okay.

10 Q The last five years.

11 A Okay.

12 Q Putting aside WAP, have you received any
13 money during that time frame from the American Society
14 for the Prevention of Cruelty to Animals?

15 A Yes.

16 Q How much have they paid you?

17 A I believe it was -- I know there was a \$5,000
18 grant and there was a thousand that I can recall. And
19 past that, it was while I was on Greyhound, it was a
20 \$250 grant a week.

21 Q And do you know how long that 250 per week
22 lasted?

1 A A week. Oh, you mean --

2 Q For how long a period of time were you
3 getting \$250 a week from ASPCA?

4 A It wasn't steady. You know, I would really
5 have to sit down and break it down. Up until
6 probably -- I am not sure. I would have to break it
7 down. You know, it was some and it was periodically.

8 Q Do you have any estimate as you sit here
9 today about what the total amount paid by ASPCA to you
10 was during this time frame?

11 A I guess maybe 10, 15, 16,000, somewhere in
12 that. It could be more. I am not familiar with -- I
13 don't do their books, so.

14 Q During this same period, sir, have you been
15 paid any money by the Animal Welfare Institute?

16 A I received grants from them.

17 Q How much money have you received from them?

18 MS. MEYER: Could I just object? When you
19 say during the same period, are you -- it is not clear
20 whether you are talking about the same period he was
21 receiving money from ASPCA or from 2001 to the present.

22 BY MR. SIMPSON:

1 Q During the period since 2001, sir -- well,
2 let's put it this way. During the period -- well,
3 that's a good time frame. Since 2001, how much money
4 have you received from the Animal Welfare Institute?

5 A Well, again, from the actual -- that's going
6 to be -- that would be a guess, and I would rather not
7 just guess at this. It is not right.

8 Q All right. But they have paid you something;
9 is that correct?

10 A They have issued grants, but -- I believe
11 there was twice where they actually had physically sent
12 me a check and once I know for sure. I am going to say
13 once that I know of for sure, which was in Florida. I
14 believe that was for \$500 for media down in Florida. I
15 can vouch for that. The rest of it not -- I wouldn't
16 have any way of really telling what they put into it.

17 Q Since 2000 --

18 A Maybe --

19 Q I'm sorry. Are you finished?

20 A Yeah, I am done. Sorry.

21 Q Since 2001, sir, and putting aside the
22 vehicle repair payment, has the Fund for Animals paid

1 you any money?

2 A Other than the one time I talked about?

3 Q Yes.

4 A Oh, other than fixing the car, not that I can
5 recall.

6 Q Since 2001 have you -- other than the
7 payments you have received from the Wildlife Advocacy
8 Project, have you received any payments directly from
9 Eric Glitzenstein?

10 A No.

11 Q Since 2001 other than payments that you have
12 received from the Wildlife Advocacy Project, have you
13 received any payments from Katherine Meyer?

14 A No.

15 Q Since 2001 other than the payments from
16 Wildlife Advocacy Project, have you received any money
17 from the law firm Meyer, Glitzenstein, and Crystal?

18 A Yeah -- yes.

19 Q How much?

20 A Well, it was when my sister died. No, that
21 wasn't from the firm, no. I am going to have to say--
22 because I am little confused here because Meyer and

1 Glitzenstein is a law firm. And if you are talking
2 about them giving me grants, I can't recall.

3 Q Since 2001 have you received any money from
4 the Animal Protection Institute?

5 A Yes, \$50.

6 Q Other than Mr. Glitzenstein, Ms. Meyer, and
7 their law firm, have you received since 2001 any money
8 from any other lawyer involved in this case?

9 A No.

10 Q Do you have a laptop computer?

11 A Yes.

12 Q Who provided that?

13 A A gentleman in California who -- friend.

14 Q All right. Is that -- who is that person?
15 His name?

16 A Rich.

17 Q Rich what?

18 A I believe it is Rubin.

19 Q Is he associated with any animal welfare or
20 animal advocacy to your knowledge?

21 A Not to my knowledge. He is a friend of
22 animals.

1 Q What do you mean by that?

2 A He likes elephants.

3 Q Do you have a cell phone?

4 A Yes.

5 Q Who provides that? Let me rephrase. Who
6 pays for that cell phone?

7 A I believe that's out of the grants for the --
8 I believe it is WAP, Wildlife Advocacy Project.

9 Q All right. And how long have you had that
10 cell phone?

11 A Oh, that's -- I have had a cell phone at
12 different times during the whole time. Like when I was
13 with the ASPCA, I had a cell phone. So I would say
14 from -- I don't know when the bills started -- a year
15 or two.

16 Q During the period since 2001, have you had a
17 cell phone the entire time?

18 A Not the entire time but majority of it.

19 Q For the time when you did have a cell phone,
20 was there any point in time when you paid the bill with
21 money other than money provided to you by WAP or ASPCA?

22 A No.