

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION)	
OF CRUELTY TO ANIMALS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civ. No. 03-2006 (EGS/JMF)
)	
RINGLING BROTHERS AND BARNUM & BAILEY)	
CIRCUS, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFF TOM RIDER’S MOTION FOR A PROTECTIVE ORDER
WITH RESPECT TO CERTAIN FINANCIAL INFORMATION**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for good cause and to protect plaintiff Tom Rider and those who have chosen to support his media and public education efforts from “annoyance, embarrassment, [or] oppression,” Mr. Rider hereby moves for a protective order under which he would provide defendants Ringling Brothers and Barnum & Bailey Circus and Feld Entertainment with information they have requested concerning his sources of funding for the last seven years, but ensure that such information is used for this litigation only, and is not publicly disseminated without permission from plaintiffs’ counsel or this Court. In addition, in view of defendants’ well established pattern of harassing, intimidating, spying on, suing, or taking other adverse actions against those who oppose defendants’ abuse of animals in the circus, Mr. Rider also seeks a protective order that will ensure that defendants do not engage in any such activities with respect to the individuals and groups who he identifies as having provided him funding for his public advocacy on this issue.

In support of this motion, Mr. Rider submits the accompanying memorandum of law, Exhibits A - C, and a proposed Protective Order. In addition, pursuant to Rule 26(c), plaintiffs' counsel certifies that she has in good faith conferred with counsel for defendants in an effort to resolve this dispute without court action, but that defendants have refused to discuss entering into any confidentiality agreement with respect to these matters. Instead, on March 20, 2007 defendants filed a motion to compel disclosure of all of this information, insisting to the Court – completely erroneously – that Mr. Rider has refused to provide this information to them. See Defendant Feld Entertainment, Inc.'s Motion to Compel Discovery From Plaintiff Tom Rider And For Sanctions, Including Dismissal (Docket No.126).

Respectfully submitted,

/s/ Katherine A. Meyer

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