

supplemental document production made on January 31, 2007, five of which post-dated March 30, 2004. At the meeting, I then personally asked Meyer whether Rider finally had produced everything he had. There was no time limitation involved in the question. Meyer responded without qualification that Rider had produced everything with the possible exception of maybe a videotape. (Videotape was stated by Meyer in the singular, not the plural.) There was no time limitation on Meyer's response to exclude, as she now claims, Rider's documents from the past three years. Such a response would have not only been entirely inconsistent with the course of conduct that had occurred between counsel since November but also entirely inconsistent with Rider's supplemental production on January 31, 2007.

4. Meyer offered to go back and re-check once again with Rider to make sure he had produced everything. Again, there was no time limitation placed on this offer by Meyer. The offer did in fact result in yet another supplemental production from Rider, which Meyer references in paragraph 5 of her declaration by citing to the e-mail she sent in late February. That supplemental production from Rider occurred on March 2, 2007. See Ex. 1 hereto (production letter). It contained not one but several videotapes along with documents, which Meyer declines to reference in her declaration. Again, some of these materials post-dated March 30, 2004, including three "grant" letters from WAP to Rider dated October and November 2006. Again, this production is entirely inconsistent with Meyer's claim now that she had limited her response to pre-March 30, 2004 documents.

5. Also at the February 7 meeting, after discussing whether Rider had produced everything, I then asked what he had done with his documents. Meyer responded, as she puts it "candidly," see Meyer Decl. ¶ 3, that he was "not keeping them." That is a direct quote from her that I, along with my other two colleagues who were present, distinctly recall. Meyer also stated

that Rider lives in a van, and he just does not keep documents. Again, there was no temporal limitation to this exchange, and Meyer did not limit her response to documents pre-dating March 30, 2004.

6. During our meeting, I used the example of documents produced by WAP to demonstrate what Rider had failed to produce. This discussion included the Forms 1099 that WAP has prepared for Rider, which are dated 2002 to 2005. Meyer flippantly stated that we had received these from WAP, and that she would re-copy them and provide us with duplicates on behalf of Rider. Here again, there was no limitation of the WAP documents to those pre-dating March 30, 2004. Meyer's present claim makes no sense whatsoever because half of the 1099's post-date March 2004.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of May, 2007.



Lisa Zeiler Joiner

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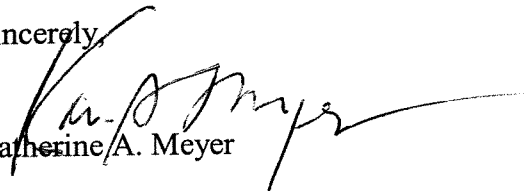
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Re: ASPCA v. Ringling Bros., Civ. No. 03-2006

Dear Ms. Joiner:

Enclosed are additional supplemental responses to Defendants' Document Production Requests to Tom Rider, including seven videotapes labeled TR00198-00204, and documents labeled TR00205-00220.

Sincerely,


Katherine A. Meyer



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