

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

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

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

Defendants. :

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Washington, D.C.

Thursday, October 12, 2006

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

1 APPEARANCES:

2 On behalf of the Plaintiffs:

3 KATHERINE A. MEYER, ESQ.

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12 On behalf of the Defendants:

13 JOHN M. SIMPSON, ESQ.

14 MICHELLE C. PARDO, ESQ.

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18 (202) 662-0200

19

20 ALSO PRESENT:

21 ALICIA CLARK

22 ELLEN HEBERT, Videographer

1 where --

2 Q What is your address, sir?

3 A It's in California.

4 Q Is there a street address?

5 A It is 1409 Elizabeth, Cudahy, California.

6 Q Is that a house that you own or rent?

7 A No. It is just a place where I can receive
8 mail if, for instance, insurance or something, you
9 know, for my vehicle that has to be sent there or
10 something.

11 Q Is there any reason why that you are aware of
12 why you couldn't get in your van and come to
13 Washington, D.C. to be a trial witness in the next two
14 years?

15 A Is there any reason that I couldn't be --

16 Q Let me rephrase it. I am sorry. Is there
17 any -- is there any reason, sir, that you are aware of
18 why you could not get in your van and drive to
19 Washington, D.C. and be a witness in this case in the
20 next two years?

21 A No.

22 Q Do you plan to be incarcerated in the next

1 two years?

2 A No.

3 Q Do you know any reason why you might go to
4 jail in the next two years?

5 A No.

6 Q Do you lack the financial means to be a trial
7 witness in this case?

8 A No.

9 Q Do you refuse to accept a subpoena if one of
10 the plaintiff organizations gave you one for trial?

11 A Would I -- no, I would not refuse a summons
12 or subpoena.

13 MR. SIMPSON: Just to clear up an objection I
14 made when we started this. I got confused between
15 Plaintiff's Exhibit 4 and Exhibit 1. I thought one was
16 the interrogatory. It was not. I am sorry. I didn't
17 mean to make the objection to that document. I meant
18 to make the objection to number four, which is the
19 answers to the interrogatories. So I withdraw the
20 objection to number one, and I make the objection to
21 number four just so the record is clear.

22 Let's mark this as Defendant's Exhibit 1.