



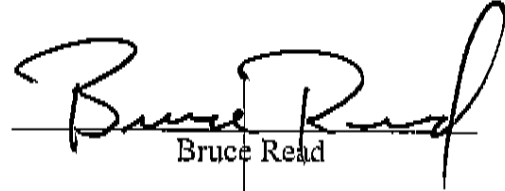
Such notes also provide an invaluable tool for reviewing and improving current and future diagnostic techniques.

4. Many of the documents that plaintiffs have requested form the basis of research papers and articles that I and other of defendants' employees and consultants are preparing, including an article on elephant gestation, parturition (birth), and mother-infant bonding, as well as studies of elephant physiology. The publication of such articles and studies will be of great value to me and to my professional colleagues.

5. Preserving the confidentiality of the data in these records is vital to my ability to publish these articles. If the data is released prior to publication, then the study's value will be greatly diminished because it will be perceived as a preliminary study with a small data set, rather than a broad-based foundation study, *i.e.*, a study that covers new scientific areas based on previously unavailable data.

6. Publication of a foundation study will secure Feld's position as a leader in scientific research for the captive management and biology of the Asian elephant and will aid Feld's stature in the captive breeding community as a serious scientific institution. This will further Feld's full participation in the captive breeding community.

Pursuant to 28 U.S.C. § 1746, I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
Bruce Read

February 15, 2005