

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,

v.

RINGLING BROS. AND BARNUM &
BAILEY CIRCUS, et al.,

Defendants.

Case No. 03-2006 (EGS)
JUDGE: Emmet G. Sullivan

**DEFENDANTS' FIRST SET OF DOCUMENT REQUESTS
TO PLAINTIFFS AMERICAN SOCIETY
FOR THE PREVENTION OF CRUELTY TO ANIMALS,
FUND FOR ANIMALS, AND ANIMAL WELFARE INSTITUTE**

Pursuant to Federal Rule of Civil Procedure 34 and the Stipulated Pre-Trial Schedule dated December 5, 2003, defendants Feld Entertainment, Inc. and Ringling Bros. and Barnum & Bailey Circus request that plaintiffs American Society for the Prevention of Cruelty to Animals ("ASPCA"), Animal Welfare Institute ("AWI"), and the Fund for Animals ("FFA") produce, give access to, and permit the undersigned counsel for defendants to inspect and copy any and all of the materials hereinafter requested before or within thirty (30) days after the date of service of this request, at a place to be mutually agreed upon by counsel. The following definitions and instructions should be considered in responding to these Requests.

29. All documents that refer, reflect, or relate to the presence of tuberculosis in circus elephants.

30. All documents that refer, reflect, or relate to legislative bans on use of animals in circuses in U.S. and foreign jurisdictions including without limitation legislation and proposed legislation, correspondence, and speeches or testimony regarding such legislation.

31. Any fact sheets that refer, reflect, or relate to the presentation of and/or treatment of elephants in circuses, and any documents or records underlying or associated with those fact sheets.

32. All documents that contain statements made by you, to you, or of which you are aware that refer, reflect, or relate to anything positive or favorable about defendants' care for, handling training of, or treatment of their elephants.

33. Any other correspondence or other documents in your possession that refer, reflect, or relate to support for or opposition to the presentation of elephants in circuses or to circuses in general, including but not limited to speeches, articles, letters to the editor, and Internet postings.

34. All speeches, presentations, testimony, or correspondence that refer, reflect, or relate to defendants or other circuses.

35. All documents referenced in your Initial Disclosures not covered by an earlier request.

36. All documents in your possession not covered by an earlier request that refer, reflect, or relate to any person identified in your Initial Disclosures as likely to have discoverable information that you may use to support your claims in this case.