

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.

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

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

Pursuant to Federal Rule of Civil Procedure 33 and the Stipulated Pre-Trial Schedule dated December 5, 2003, defendants Feld Entertainment, Inc. and Ringling Bros. and Barnum & Bailey Circus hereby propound the following first set of interrogatories to plaintiffs the American Society for the Prevention of Cruelty to Animals ("ASPCA"), the Animal Welfare Institute ("AWI"), and the Fund for Animals ("FFA"). Plaintiffs are requested to respond to these interrogatories within thirty (30) days after the date of service of these interrogatories, in accordance with Federal Rule of Civil Procedure 33(b)(3).

communicated the position to your membership or to others, including to government officials or persons in the business of operating circuses.

18. Describe any and all positions you have taken, held, or espoused as regards the use of ankuses to train, handle, or care for elephants, the date on which you adopted or espoused each such position, whether you still hold such position, and the manner in which you communicated the position to your membership or to others, including to government officials or persons in the business of operating circuses.

19. Describe each communication you have had since 1996 with any other animal advocates or animal advocacy organizations about the presentation of elephants in circuses or about the treatment of elephants at any circus, including Ringling Bros. and Barnum & Bailey Circus.

20. Describe each communication in which any person, other than defendants or their employees, has expressed support for or otherwise said positive things about defendants' treatment of their elephants.

21. Identify each resource you have expended from 1997 to the present in "advocating better treatment for animals held in captivity, including animals used for entertainment purposes" as alleged in the complaint, including the amount and purpose of each expenditure.

22. Identify each expenditure from 1997 to the present of "financial and other resources" made while "pursuing alternative sources of information about defendants' actions and treatment of elephants" as alleged in the complaint.