



reflect, or relate to allegations in the complaint of defendants “forcibly remov[ing] baby elephants from their mothers with the use of ropes and chains,” defendants’ intent to “establish dominance and control over the baby elephants” through the separation process, or any alleged injuries suffered by Doc, Angelica, or any other elephant during the process of being separated from its mother.

17. All documents that refer, reflect, or relate to the death of Kenny, including without limitation any documents that refer, reflect, or relate to allegations in the complaint of “Ringling Bros. ma[king] Kenny perform on the day that he died, even though it knew that he was ill” and any documents that refer, reflect, or relate to Kenny allegedly being “routinely beaten and hit by Ringling Bros.”

18. All documents that refer, reflect, or relate to any communications between you and any federal, state, or local government agency or official regarding any circus including, but not limited to, Ringling Bros. and Barnum & Bailey Circus.

19. All documents that refer, reflect, or relate to any communications you have had with defendants or any current or former employee of defendants since your employment by defendants ended.

20. Bank statements or other documents demonstrating your sources of income since you stopped working in the “circus community.”

21. All documents that refer, reflect, or relate to any payments or gifts in money or goods made by any animal advocates or animal advocacy organizations to you, including but not limited to any payment of your transportation expenses, hotel bills, or food, or other costs of living by any animal advocates or animal advocacy organizations.