

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, )  
 )  
 v. )  
 )  
 FELD ENTERTAINMENT, INC. )  
 )  
 Defendant. )

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Civ. No. 03-2006 (EGS/JMF)

**DECLARATION OF DENIZ BOLBOL**

1. I am making this declaration based on my personal knowledge.
2. I have reviewed a copy of all of the video footage that is listed as Exhibit 128 on

the Exhibit List that the plaintiffs provided in their August 29, 2008 Pre-trial Statement, which contains video footage from a video that is labeled "Ringling-Angelica & Sara chained & Swaying (PL 08980)," and is also referred to as Exhibit 3A to VA 05008 USDA Investigation (PL 14913). I hereby verify that I am the videographer who took the video footage in PL 14913 starting at the beginning (0:00) and ending at approximately 2 minutes and 22 seconds (2:22). I also took the video footage in PL 08980 starting at 12 minutes and 16 seconds (12:16) and ending approximately 12 minutes and 50 seconds (12:50), and the video footage starting at 16 minutes and 13 seconds (16:13) and ending at approximately 17 minutes and 35 seconds (17:35). I took the video footage of Ringling Brothers elephants in Oakland, California in August

2004. The footage contained on this exhibit is a true and accurate depiction of video footage that I recorded, and it accurately represents what I saw when I took that video footage on that day.

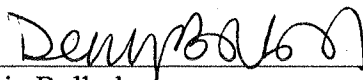
3. I have reviewed a copy of the video footage that is listed as Exhibit 146 on the Exhibit List that plaintiffs provided in their August 29, 2008 Pre-trial Statement. I took all the video footage that has a date and time stamp with one exception (the clip that is date and time stamped August 27, 8:54 p.m.). I hereby verify that I took this video footage of the Ringling Brothers Circus in San Jose, California in August 2005. The footage contained on this exhibit is a true and accurate depiction of video footage that I recorded, and it accurately represents what I saw when I took that video footage on that day.

4. I have also reviewed a copy of the video footage that is contained in Exhibit 121-A on the Exhibit List that plaintiffs provided in their August 29, 2008 Pre-trial Statement (labeled "Ringling Abuse (PL 07074)"). I hereby verify that I took the video footage of a young elephant chained in a tent that appears at approximately 9 minutes and 49 seconds (9:49), and ends at approximately 12 minutes and 14 seconds (12:14), and that I took that video footage in Oakland, California in August, 2002. The footage contained on this exhibit is a true and accurate depiction of video footage that I recorded, and it accurately represents what I saw when I took that video footage on that day.

5. I verify that all of the video footage that I recorded, which is described above, is a true and accurate depiction of what I actually videotaped and has not been altered in any way, and that the vide footage accurately represents what I saw on those days in those locations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct.

  
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Deniz Bolbol

Date: Sept 29, 2008