

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

Civ. No. 03-2006 (EGS)
(D.D.C.)

vs.

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

**CERTIFIED
COPY**

Defendants. /

VIDEOTAPED DEPOSITION OF ROBERT RIDLEY

Friday, August 25, 2006

9:25 a.m.

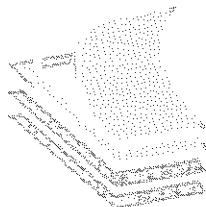
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I N D E X O F E X H I B I T S

<u>Plaintiffs':</u>	<u>Page</u>
1 Subpoena	6
2 Affidavit	108
3 E-mail from Dr. Ramiro Isaza, with two black & white photocopies of pictures	131
4 Videotape	134

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1 the time?

2 A I think there was 16.

3 Q Do you recall whether they were all Asian
4 elephants?

09:37:02 5 A Yes, they were all Asian.

6 Q They were.

7 Are any of the elephants that were with
8 Ringling Bros. then still there today?

9 A Still. . .

09:37:17 10 Q Still on the show today.

11 A Just one.

12 Q Which one?

13 A Jewel.

14 Q Okay. And so you were hired by Ringling Bros.

09:37:36 15 in 1966, and you are still there today, correct?

16 A Yes.

17 Q And at any time since 1966, have you left to be
18 employed by anyone other than Ringling Bros.?

19 A No.

09:37:45 20 Q So you've been there consistently since 1966?

21 A Yes.

22 Q Okay. And when you arrived and started working
23 as a barnman in 1966, were you provided with any
24 training concerning the handling or care of the
09:38:10 25 elephants?

1 Q With the elephants or other animals.

2 A I was just with the elephants.

3 Q So you continued --

4 A Yes.

10:44:42 5 Q -- to provide emergency care to the elephants?

6 A Yes. Yes.

7 Q And what type of emergency care did they need,
8 if you can give some examples?

9 A Occasionally there would be a foot infection. I
10:45:04 10 would notify Debbie.

11 Q Do you treat the infection?

12 A Yes. Yes.

13 Q How do you treat a foot infection?

14 A With ointments or creams.

10:45:21 15 Q Do you treat any other injuries on elephants?

16 A Occasionally a puncture wound.

17 Q And how do you treat a puncture wound on an
18 elephant?

19 A With an antiseptic.

10:45:48 20 Q Do you ever use a product called Wonder Dust?

21 A Probably 12 or 15 years ago. There's much newer
22 medications on the market now.

23 Q So you never -- today you never use a product
24 referred to as Wonder Dust?

10:46:13 25 A Not with the elephants, no.

1 Q With other animals?

2 A I don't know.

3 Q So what product replaced Wonder Dust?

4 A There was various creams that was used for the
10:46:34 5 elephants.

6 Q So can you tell me the names of any of the
7 products you would use to treat a puncture wound on an
8 elephant today?

9 A No. Whatever the veterinary technician told me.

10:46:51 10 Q Okay. What would typically cause a puncture
11 wound on an elephant?

12 A The browse or what's commonly referred to as a
13 bullhook.

14 Q As a bullhook?

10:47:22 15 A Yes. I prefer a stick or a guide.

16 Q Okay. But when you say -- when you use the term
17 "stick" or "guide," you are referring to what's also
18 known as a bullhook, correct?

19 A Yes.

10:47:39 20 Q Okay. How often do you see puncture wounds
21 caused by bullhooks?

22 A Probably three to four times a month. That's
23 with the whole herd of elephants.

24 Q And where do you typically see those puncture
10:48:06 25 wounds?

1 A Under the chin. Occasionally on the back of the
2 leg.

3 Q Anywhere else?

4 A No.

10:48:24 5 Q Behind the ear?

6 A No.

7 Q You never see a puncture wound behind the ear
8 caused by a bullhook? Is that your testimony?

9 A In years past I have.

10:48:43 10 Q But in recent years --

11 A No.

12 Q -- the answer is "no"?

13 A No.

14 Q Okay. So just so I understand your testimony:

10:48:55 15 You said you would typically see the puncture wounds
16 under the chin or on the back of the leg.

17 A Yes.

18 Q Anywhere else on the elephant's body?

19 A No.

10:49:06 20 Q On the head at all?

21 A No.

22 Q Okay. So since 2001, I guess, when

23 Ms. Fahrenbruck came, you said your duties with regard
24 to veterinary care reduced somewhat?

10:49:29 25 A Yes.

1 Q And did you pick up any additional duties at
2 that time?

3 A No.

4 Q So you continued presenting?

10:49:49 5 A I presented until -- well, yes. Until today.

6 Q Has there ever been a time since -- I can't
7 remember -- you started presenting, I think, in 1969,
8 correct?

9 A '68.

10:50:11 10 Q '68. Has there ever been a time that you
11 haven't been a presenter other than the time -- the
12 two years you said you were in winter quarters?

13 A No.

14 Q Have your duties changed at all with respect to
10:50:34 15 training the elephants?

16 A I'm not a trainer.

17 Q You are not a trainer. Have you ever trained
18 any elephants?

19 A No.

10:50:43 20 Q All right. Who are the elephants currently
21 traveling on the blue unit?

22 A Minyak, Jewel, Nicole, Karen, Juliet, Bonnie,
23 KellyAnn and Sara.

24 Q Okay. Is that in order of age? Do you know?
10:51:32 25 Or, no?

1 A No.

2 Q Okay. Who is the oldest?

3 A Jewel.

4 Q Oh, Jewel. Right. You said she was there when
10:51:42 5 you first started?

6 A Yes. Yes.

7 Q And has she been on the blue unit the entire
8 time you've been on the blue unit?

9 A She was at the conservation center for -- I
10:51:55 10 believe it was a year, year and a half.

11 Q When you say "the conservation center," are you
12 referring to the Center for Elephant Conservation?

13 A Yes. Yes.

14 Q Do you know when she was there?

10:52:05 15 A I believe it was last year she was there.

16 Q Do you know why she was sent to the Center for
17 Elephant Conservation?

18 A Just rest, I guess.

19 Q Who made the decision to take her off the blue
10:52:30 20 unit and send her to the -- I'll call it the CEC. Is
21 that okay?

22 A CEC.

23 Q The Center for Elephant Conservation.

24 A CEC.

10:52:37 25 Q Who made the decision to send her to the CEC?

1 Do you know?

2 A Troy Metzner.

3 Q Can you spell Troy's last name? Is it Metzler?

4 A Maybe it is Metzler.

10:52:49 5 Q I think it's M-e-t-z-l-e-r. Does that sound
6 correct?

7 A Yes.

8 Q Okay.

9 A And Dr. Lindsay.

10:52:57 10 Q And do you know why it was determined that she
11 needed rest?

12 A She was old -- well, and she needed -- she had a
13 stiff leg.

14 Q Do you know what caused her stiff leg?

10:53:22 15 A There was another elephant that knocked her
16 down.

17 Q Do you know which elephant?

18 A Zina.

19 Q This was last year, you said, or about a year
10:53:34 20 and a half ago?

21 A No. No. This was probably five or six years
22 ago.

23 Q Oh, when Zina knocked her down?

24 A Yes. Yes.

10:53:43 25 Q I see. So she's had a stiff leg since then?

1 A Yes.

2 Q But just so I understand what you are saying:

3 She was -- she remained on the blue unit until last
4 year?

10:53:52 5 A Yes.

6 Q At which point, Mr. Metzler and Mr. Lindsay
7 decided to send her --

8 A It was Dr. Lindsay.

9 Q Dr. Lindsay decided to send her to the CEC?

10:54:05 10 A Yes.

11 Q And how long did she stay at the CEC? Do you
12 know?

13 A It was about a year, year and a half -- well,
14 she came back on the road the beginning of this year.

10:54:17 15 Q And does she still have a stiff leg?

16 A Yes.

17 Q Are you aware why the decision was made to
18 return her to the blue unit if she still has a stiff
19 leg?

10:54:38 20 A No.

21 Q Do you know whether any effort was made to breed
22 her at the CEC?

23 A No.

24 THE WITNESS: Could I take a break?

10:54:57 25 MS. OCKENE: Yes.

1 A I believe she's with the gold unit.

2 Q The gold unit is the third --

3 A A third unit.

4 Q -- unit?

11:01:59 5 How many elephants do they have?

6 A Two.

7 Q Angelica, and who is the other?

8 A Mysore.

9 Q Okay. Was an elephant named Shirley ever on the

11:02:21 10 blue unit?

11 A Yes.

12 Q Do you know when that was?

13 A I think it was 1996 and part of 1997.

14 Q Was she there longer than that? Do you know?

11:02:55 15 A I don't think so. I don't remember.

16 Q Do you know why she left the blue unit?

17 A No.

18 Q So were you consulted at all regarding Shirley's
19 departure from the blue unit?

11:03:19 20 A No.

21 Q Do you know where she is now?

22 A I believe she's at the CEC.

23 Q Okay. Now, Nicole, you said, is currently with
24 the blue unit, right?

11:03:37 25 A Yes.

1 Q Was she at one point -- has she been with the
2 blue unit -- let me ask it this way.

3 How long has she been with the blue unit?

4 A I think 1980.

11:03:59 5 Q And has she been there the entire time, or do
6 you know whether at any point Nicole was taken off and
7 later returned to the blue unit?

8 A She was taken off and then returned.

9 Q Do you know when she was taken off?

11:04:16 10 A I think it was 1994, the end of 1994.

11 Q Would it sound accurate to you if I said she was
12 taken off the blue unit in 1999?

13 A She's been taken off twice, then.

14 Q Oh, okay.

11:04:51 15 A Twice.

16 Q So 1994 first?

17 A First.

18 Q And then later?

19 A Later.

11:04:56 20 Q 1999. Does that sound right?

21 A Somewhere around there, yes.

22 Q Okay. Can you tell me why she left in 1994?

23 A She became just very stiff-legged.

24 Q Do you know what caused her stiffness?

11:05:18 25 A No.

1 Q At the time, you were the veterinary -- the
2 acting veterinary technician, correct?

3 A Yes. Yes.

4 Q So what, if anything, were you doing to treat
11:05:32 5 her stiff legs?

6 A When it happened, she was sent back to the -- to
7 the CEC because the legs were swollen. It was
8 difficult for her to walk.

9 Q Was that something that happened all of a sudden
11:06:00 10 or was it something that happened gradually?

11 A It was probably within three or four days.

12 Q And again, do you have any recollection what
13 caused the swelling in her legs?

14 A No.

11:06:19 15 Q Okay. And where was she sent when she was taken
16 off of the blue unit in 1994?

17 A At that time, she would have been sent to the
18 retirement farm in Williston, Florida.

19 Q Okay. And when was she returned to the blue
11:06:56 20 unit after she left in 1994?

21 A I think it was 1996.

22 Q Okay. And was her -- were her legs healed when
23 she returned?

24 A They were back to normal.

11:07:26 25 Q And then you said she left again in -- you think

1 around 1999?

2 A Yes. The same problem.

3 Q Same problem?

4 A Yes.

11:07:46 5 Q Swollen legs?

6 A Swollen legs.

7 Q And at that time you were also still the
8 acting --

9 A Yes.

11:07:59 10 Q -- veterinary technician?

11 A Yes. Yes. Yes.

12 Q And did you do anything to treat her legs at
13 that time?

14 A The veterinarian said that it would be best just
11:08:14 15 to give her rest at that time.

16 Q And who was the veterinarian at that time, 1999?

17 A '99? It was either Dr. West or Dr. Isaza. I'm
18 not sure.

19 Q Isaza?

11:08:37 20 A Isaza.

21 Q And who -- just to back up, who was the
22 veterinarian in 1994? Do you recall?

23 A Dr. Houck.

24 Q Houck. When did Dr. Lindsay come on board?

11:08:58 25 A I think 2000. Either 1999 or 2000.

1 Q Okay. So in -- somewhere around 1999, you say
2 Nicole had the same problem with swollen legs --

3 A Yes.

4 Q -- that led to her being taken off the show
11:09:26 5 again.

6 Do you know, at that time, was it a sudden
7 onset condition or was it a gradual -- gradually
8 onset condition?

9 A It was a gradual at that time.

11:09:40 10 Q Were you the first person to notice it?

11 A Yes.

12 Q Okay. And do you know what caused it at that
13 time?

14 A No.

11:09:52 15 Q And how long did she -- first of all -- I'm

16 sorry. When she was taken off the second time, where
17 did she go? Do you know?

18 A To the CEC.

19 Q Went to the CEC.

11:10:28 20 Do you know whether there was any effort to
21 breed her at the CEC?

22 A I don't know.

23 Q And how long did she stay at the CEC for?

24 A She came back -- I believe it was 2001.

11:10:53 25 Q And were her legs healed when she returned to

1 the blue unit?

2 A They were back to normal.

3 Q And has she been on the blue unit since 2001?

4 A Yes.

11:11:12 5 Q And has there been any recurrence of her
6 leg-swelling condition since 2001?

7 A No.

8 Q Do you have a relationship with any elephant or
9 elephants in particular?

11:11:38 10 A Karen.

11 Q Can you tell me about Karen. For example, her
12 history, to the extent you know it, when she came to
13 the blue unit, where she came from.

14 A She came through an animal dealer in 1969,
11:12:01 15 December. She was between four and six months old.

16 Q She was wild-caught? Do you know? Taken from
17 the wild?

18 A The understanding I had -- or the information I
19 could get, she was -- she came from a zoo in Bangkok.
11:12:28 20 I don't know if she was wild-caught or captive-bred.

21 Q Okay. So you've known her basically her whole
22 life?

23 A Yes.

24 Q And who trained Karen to perform tricks?

11:12:40 25 A Hugo Schmitt started. And he retired and Axel

1 Q Are there places on the elephant that you would
2 never place the hooked end of the bullhook?

3 A In the eyes, in the mouth, the backside.

4 Q So you've never used the hooked end of a
11:55:24 5 bullhook in an elephant's mouth?

6 A No.

7 Q Have you ever seen anyone use the hook in an
8 elephant's mouth?

9 A No.

11:55:31 10 Q Would it ever be appropriate to use the hook --

11 A No. Absolutely not.

12 Q -- in an elephant's mouth?

13 No, it would not be?

14 A No.

11:55:42 15 Q Are elephants very sensitive with their mouths?

16 A Same as a person would be.

17 Q Are the elephants cued with the bullhook to
18 perform their tricks during the performance?

19 A Yes.

11:56:02 20 Q In what way?

21 A It's like the hook can be two and three feet
22 from the elephant, and it would be "Come here," you
23 know, "tub." Or move them around the tub; it would be
24 "Come here" (indicating).

11:56:25 25 Q Okay. So do you typically use the bullhook to

1 cue an elephant to perform a trick as opposed to a
2 voice command?

3 A Not always, no.

4 Q Under what circumstances would you --

11:56:41 5 A It's sort of a 50-50.

6 Q So 50 percent of the time you would use a voice
7 command and --

8 A Yes.

9 Q -- and 50 percent of the time you would use the
11:56:53 10 hook?

11 A Well, the hook would be away from the elephant,
12 but -- the elephant would see the handler and the hook
13 and follow.

14 Q So you are saying -- just to be clear, you are
11:57:10 15 saying that you wouldn't necessarily apply the hook to
16 the elephant?

17 A No. No.

18 Q Under what circumstances would you actually hit
19 or apply the hook to the elephant?

11:57:25 20 A Just pressure, to get it moving.

21 Q So if they weren't responding?

22 A Yes.

23 Q Okay. How many -- do you own your own
24 bullhooks?

11:57:42 25 A They are bought by Feld Entertainment from a

1 Charlie Gray in Canada.

2 Q So the ones that you use are not your personal
3 possessions?

4 A Well, they are Feld equipment. But when they
11:58:10 5 are presented to us, they say, Okay. Here is your
6 bullhook.

7 Q Okay. How many do you have in your possession?

8 A I have three right now, from Charlie Gray.

9 Q And do you use all of those equally?

11:58:31 10 A No. I have a small one that I use in the show
11 and a larger one I use for the animal walks.

12 Q Why would you use a larger one for the animal
13 walks?

14 A Just as a safety precaution.

11:58:47 15 Q What do you mean when you say "a safety
16 precaution"?

17 A Because there's always that chance that the
18 public might get a little too close to the animal.
19 And you have a little more handling power, you might
11:59:09 20 say. Or a dog might run under them or something of
21 that sort and startle them.

22 Q So are you saying that the larger bullhooks are
23 more useful in controlling an elephant?

24 A No. It's just more -- to me, it's just more of
11:59:32 25 a safety.

1 Q Are you worried that an elephant is going to
2 become dangerous?

3 A No. They can be startled by occasional small
4 children or dogs.

11:59:50 5 Q And what would you do with the bullhook if an
6 elephant became startled?

7 A I would hold it under the chin, and say,
8 "Steady. Steady." And try to calm them.

9 Q Have you ever seen anyone at Ringling Bros.
12:00:29 10 strike an elephant with force with a bullhook?

11 A What do you mean by "force"? Force is something
12 like -- like using a baseball bat.

13 Q Or just applying weight or force while using the
14 hooked end of the bullhook. In other words, not just
12:00:51 15 touching.

16 A Nothing intentional, no.

17 Q Does that mean you have seen it?

18 A I've seen, you know, tapping (indicating).
19 Tapping on the legs, the trunk.

12:01:09 20 Q Have you ever seen anyone yank an elephant with
21 the hooked end of a bullhook, like apply the hook to
22 the skin and then pull with some force?

23 A I'm thinking. Yes.

24 Q Under what circumstances? And can you tell me
12:01:50 25 who you saw do that?

1 A The elephants were starting to, like, move out
2 of line. And just going in and (indicating) pulling
3 them back in line.

4 Q Is it something that you have done?

12:02:07 5 A Yes, I have done.

6 Q And who else have you seen --

7 A Troy Metzler.

8 Q -- do that?

9 A Mike Haywood, Hisham.

12:02:18 10 Q So would you say that it is a common occurrence
11 to apply the hooked end to an elephant and pull or
12 yank with some force to get the elephant to do what
13 you want the elephant to do?

14 A Each person has their own technique of pulling
12:02:48 15 or guiding an elephant.

16 Q Would you say that it's common for the handlers
17 on the blue show, including yourself, to apply
18 pressure or some force when using the hooked end of
19 the bullhook in the elephants?

12:03:07 20 A Yes.

21 Q Have you ever seen anyone, including yourself,
22 draw blood through use of a bullhook on an elephant?

23 A Accidentally, yes.

24 Q How often would you say the hook -- the use of a
12:03:37 25 bullhook draws blood on an elephant?

1 A I would say, within the whole herd, probably
2 three to four times a month.

3 Q And you say "accidentally." How does it happen
4 accidentally?

12:03:56 5 A Sometimes, when we're maneuvering them in the
6 show, it will just -- accidentally, a quick movement.

7 Q Have you ever been asked to treat these -- the
8 bleeding that is caused by the bullhooks?

9 A Yes.

12:04:25 10 Q How often do you treat these -- I guess -- would
11 you call them injuries or wounds?

12 MS. PARDO: Objection.

13 Q BY MS. OCKENE: Would you say that they are
14 injuries?

12:04:39 15 A No. No.

16 Q What would you -- just so we have a term for it,
17 what would you call it when there's blood drawn from
18 the use of a bullhook?

19 A It's very slight. It's like pricking your
12:04:56 20 finger with a needle or a paper cut.

21 Q Is it the same thing -- you said earlier you see
22 puncture wounds, on average, three to four times a
23 month from the use of a bullhook. Is that the same,
24 or would you equate the puncture wounds to the
12:05:12 25 bleeding that you are describing now?

1 A Yes. Yes. Yes.

2 Q Have you ever been asked to treat the puncture
3 wounds that are caused by the bullhooks?

4 A In years past I have.

12:05:20 5 Q And today you no longer are?

6 A No.

7 Q Who treats those wounds -- those puncture wounds
8 today?

9 A Normally, Mike Haywood.

12:05:29 10 Q And what does he treat them with?

11 A An antiseptic, ointment.

12 Q Okay. But these instances in which you say
13 somebody would accidentally cause a puncture wound
14 from a bullhook, are these instances in which someone
12:05:55 15 would be reprimanded for improper use of a bullhook?

16 MS. PARDO: Objection. Speculation.

17 MS. OCKENE: You can answer.

18 THE WITNESS: Yes.

19 Q BY MS. OCKENE: And have you ever seen anyone be
12:06:14 20 reprimanded for causing these -- what you've referred
21 to as puncture wounds from a bullhook?

22 A Yes.

23 Q And are these different from the instances you
24 were describing earlier? When we were talking about
12:06:30 25 several years ago, you recalled someone or several

1 which you are aware that someone has been disciplined
2 or reprimanded for use of the bullhook?

3 A No.

4 Q Okay.

12:10:58 5 A Not in recent times.

6 Q Okay. Has Troy ever been reprimanded, to your
7 knowledge, by anyone superior to him for use of the
8 bullhook?

9 A No.

12:11:08 10 Q No, you don't know?

11 A No, I don't know.

12 Q Okay.

13 THE WITNESS: Can I take a break?

14 MS. OCKENE: Yes.

12:11:20 15 VIDEO OPERATOR: Going off the record. The
16 time is 12:11.

17 (Recess taken.)

18 VIDEO OPERATOR: Back on the record. The
19 time is 12:15.

12:15:30 20 Q BY MS. OCKENE: Okay. Mr. Ridley, are you
21 familiar with the term "hook boil"?

22 A That's an old circus term.

23 Q What does it mean to you?

24 A It's a puncture to the skin that becomes
12:15:49 25 infected.

1 Q And is it called a hook boil because it's caused
2 by a bullhook?

3 A It was back then.

4 Q Could it be caused by anything else?

12:16:15 5 A Possibly the hook, the browse the elephants eat.

6 Q So it's -- just to make sure I understand what
7 you are saying, it's a puncture -- like a puncture
8 wound to the skin that then becomes infected?

9 A Yes, if it's not treated.

12:16:40 10 Q Okay. You say that term is no longer used
11 today?

12 A I prefer a puncture.

13 Q Just puncture or puncture wound?

14 A Yes. Yes. Puncture or puncture wound.

12:16:57 15 Q Okay. So you would use those terms
16 interchangeably, "hook boil" and "puncture wound"?

17 A Hook boil, like I said, was an older circus
18 terminology for puncture.

19 Q And do you observe -- ever observe hook boils on
12:17:25 20 the blue unit elephants?

21 A Maybe three to four times a month, the
22 punctures.

23 Q So this is, again, the same that we were
24 speaking about earlier --

12:17:38 25 A Yes.

1 Q -- the puncture wounds? Okay.

2 So I'm talking here just about hook boils or
3 puncture wounds that would be caused by a bullhook as
4 opposed to something else, and you said you would see
12:17:53 5 that about three to four times a month?

6 A Yes, with the whole herd.

7 Q Okay. And again, I guess this would be the same
8 as what you were saying about the puncture wounds, but
9 is there some way in which you would treat a hook boil
12:18:09 10 different from how you would treat a puncture wound?

11 A No.

12 Q So you would use, you were saying, antiseptic?

13 A Antiseptic, antibacterial ointment.

14 Q Okay. And again, you say you no longer use a
12:18:24 15 product called Wonder Dust.

16 A No, not with the elephants.

17 Q And when was the last time you would say you
18 used a product called Wonder Dust?

19 A Probably 1997, '98. There's a lot newer
12:18:44 20 medications now.

21 Q Okay. And I think you said you no longer treat
22 the hook boils -- also what you would call puncture
23 wounds -- on elephants?

24 A If I see one, I will treat it.

12:18:59 25 Q And you said also Mike Hayward treats --

1 A Yes, Mike. Mike does.

2 Q Anyone else?

3 A No. Mainly Mike and myself.

4 Q Do you see puncture wounds or hook boils more
12:19:20 5 frequently on certain elephants?

6 A No.

7 Q So you see them with equal frequency on all of
8 the elephants?

9 A On all of the elephants.

10 Q And you may have already answered this. I
11 apologize. But you say a hook boil or a puncture
12 wound does not get recorded anywhere in writing?
13 Would you record it anywhere in writing if you saw a
14 puncture wound on an elephant?

12:19:54 15 A No, not now.

16 Q And you would not --

17 A No.

18 Q You would not be likely to call a veterinarian?
19 Is that what you said?

12:20:07 20 A No. No. Like I said, it was like a paper cut
21 or something of that sort.

22 MS. OCKENE: Okay. I just want to have this
23 document marked as Exhibit 2.

24 (Whereupon, Plaintiffs' Exhibit 2 was marked
12:20:21 25 for identification.)

1 that ever asked you, in connection with this lawsuit,
2 to search for or turn over records?

3 A No.

4 Q Okay. How often are the elephants provided with
13:34:10 5 water while they are on the road?

6 A At least twice a day. Sometimes three and four
7 times a day. It depends on the weather conditions.

8 Q Do they have continual access to water?

9 A No.

13:34:35 10 Q Are the elephants on the blue unit chained
11 throughout the night?

12 A Yes. It's mainly a safety measure. Because if
13 the wrong elephants get together, they'll start
14 fighting.

13:35:04 15 Q And are they chained by a front leg and a back
16 leg?

17 A Yes.

18 Q Okay. And are the elephants chained whenever
19 they are on the train?

13:35:19 20 A Yes. As a safety measure, again. Because of
21 the movement of the train.

22 Q So at any point when they are on the train, the
23 elephants are chained?

24 A Yes. Yes.

13:35:31 25 Q Yes. Okay. And is water continuously available

1 in sort of a veterinary technician --

2 A Oh, after she arrived?

3 Q Yes.

4 A Yes.

13:42:52 5 Q Okay. Who is John Griggs?

6 A He's -- he was the operations manager with the
7 blue unit. He's with the gold unit now as, I think,
8 manager.

9 Q Okay. How long was he with the blue unit? Do
13:43:24 10 you know?

11 A Probably two or three years.

12 Q And when did he leave?

13 A I think the end of last year, he left.

14 MS. OCKENE: Okay. I want to have a
13:43:43 15 videotape marked as an exhibit now. So this is a
16 video that Plaintiffs produced to Defendants in
17 discovery, with Bates Number PL 8980. I guess it will
18 be marked Exhibit 4.

19 MS. PARDO: Does that video have a title?

13:44:12 20 MS. OCKENE: It's "Ringling -- Angelica and
21 Sara Chained and Swaying, Oakland."

22 (Whereupon, Plaintiffs' Exhibit 4 was marked
23 for identification.)

24 MS. OCKENE: I can't really wear this down
13:45:59 25 there. Are you going to be able to see from there?

1 asked him any questions about where this came from,
2 who, what, where. If we've seen it before.

3 MS. OCKENE: Oh, we produced it to you in
4 discovery. I read the Bates number, so you have it.

13:52:16 5 MS. PARDO: Okay. My objection is on the
6 record.

7 MS. OCKENE: Okay.

8 (Whereupon, video was played.)

9 MS. OCKENE: I'm just going to stop it and
13:52:32 10 say that I started it at a point on the video where,
11 in the lower right-hand corner, it's labeled
12 "August 18th, 2004," and 9:30:, approximately
13 10 seconds.

14 (Whereupon, video was played.)

13:53:10 15 MS. OCKENE: Okay. I'm just going to pause
16 it and ask a few questions now.

17 Q BY MS. OCKENE: Does this look like a Ringling
18 Bros. setup? Is this a Ringling Bros. elephant?

19 A Yes.

13:53:21 20 MS. PARDO: Objection to the form.

21 Q BY MS. OCKENE: Is this is a Ringling Bros.
22 elephant that you are watching on the video?

23 A Yes.

24 Q And is that elephant named Sara?

13:53:31 25 A The video is too fuzzy to. . .

1 Q Okay. I'll play it for a little while longer.
2 And see if you -- because earlier you testified you
3 would recognize them by sight.

4 A Yes.

13:53:43 5 MS. OCKENE: I'll play it a little more.

6 (Whereupon, video was played.)

7 Q BY MS. OCKENE: Can you now tell whether that is
8 an elephant named Sara?

9 A Yes, that's Sara.

13:54:35 10 Q That's Sara. Okay. Let me forward a little bit
11 more. There's another elephant that comes into the
12 picture.

13 (Whereupon, video was fast-forwarded.)

14 MS. OCKENE: Sorry. I just wanted to state
13:55:27 15 for the record that I restarted it again at a point on
16 the video -- in the lower right-hand corner it says
17 9:35, I think it was, and 15 seconds.

18 (Whereupon, video was played.)

19 MS. OCKENE: I'll stop it.

13:56:10 20 Q BY MS. OCKENE: The other elephant that was in
21 the picture, across from Sara, did you recognize that
22 elephant?

23 A It looks like either Juliet or Angelica.

24 Q Okay.

13:56:22 25 A I don't know. I can't get the size.

1 Q Let me forward it a little bit more and see if
2 she comes into the picture again.

3 A Okay. Okay.

4 (Whereupon, video was fast-forwarded.)

13:57:01 5 MS. OCKENE: Okay. We're at 9:37:35 on the
6 monitor.

7 Q BY MS. OCKENE: Can you tell which elephant that
8 is?

9 A That's Angelica.

13:57:33 10 Q Angelica.

11 MS. OCKENE: Okay. I'm going to forward a
12 significant amount more. Okay.

13 (Whereupon, video was fast-forwarded.)

14 MS. OCKENE: There's a point I'm trying to
13:59:48 15 get to.

16 (Whereupon, video was fast-forwarded.)

17 MS. OCKENE: Actually, I'm now at a point on
18 the video -- it's in the lower right-hand corner. It
19 says "8:33:28."

14:00:37 20 Q BY MS. OCKENE: Can you identify the gentleman
21 pictured in the image?

22 A That's David Whaland.

23 Q Dave Whaland or Whaley? Is that the same one
24 you thought maybe was Whaley?

14:00:50 25 A Whaley.

1 Q Okay.

2 (Whereupon, video was fast-forwarded.)

3 MS. OCKENE: Okay. I stopped it at a point
4 on the videotape. In the lower right-hand corner, it
14:02:42 5 says "9:28:57."

6 Q BY MS. OCKENE: Do you know whether this man in
7 the image now, whether his name is Brian Clark?

8 A Yes.

9 Q That's Brian Clark?

14:02:53 10 A Yes.

11 (Whereupon, video was played.)

12 MS. OCKENE: We need to change the tape.

13 VIDEO OPERATOR: Here ends Videotape
14 Number 2 in the deposition of Robert Ridley. We're
14:03:19 15 going off the record. The time is 2:03.

16 (Recess taken.)

17 VIDEO OPERATOR: Here begins Videotape
18 Number 3. We're back on the record. The time is
19 2:07.

14:07:13 20 Q BY MS. OCKENE: Okay. While we were watching
21 the video, I asked you to identify two elephants. You
22 identified one as Sara.

23 A Yes.

24 Q And the other as Angelica?

14:07:24 25 A Yes.

1 Q Do you know whether Ringling Bros. has more than
2 one elephant named Sara?

3 A No.

4 Q Just one?

14:07:31 5 A Just one.

6 Q And was she born at the CEC?

7 A Yes.

8 Q And do you know if Ringling Bros. owns more than
9 one elephant named Angelica?

14:07:40 10 A Only one.

11 Q Only one. And was she born at the CEC?

12 A Yes.

13 Q Have you been asked to testify at trial -- at a
14 trial in this lawsuit by your employer?

14:07:51 15 A To testify? No.

16 Q Would you do so if your employer asked you to?

17 A Yes.

18 MS. OCKENE: Okay. I think I'm just about
19 done, but I'd like a few minutes just to look over my
14:08:11 20 notes. Talk a little break.

21 MS. JOINER: Do you need a break?

22 MS. OCKENE: Yes.

23 THE WITNESS: Good. Good.

24 VIDEO OPERATOR: Going off the record. The
14:08:15 25 time is 2:08.