

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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|--|---|--|
| AMERICAN SOCIETY FOR THE PREVENTION |) | |
| OF CRUELTY TO ANIMALS, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| RINGLING BROTHERS AND BARNUM & BAILEY |) | |
| CIRCUS, <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

Civ. No. 03-02006
(EGS)

**OBJECTIONS AND RESPONSES TO DEFENDANTS’
FIRST SET OF INTERROGATORIES TO PLAINTIFF TOM RIDER**

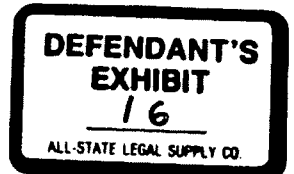
Pursuant to Federal Rule of Civil Procedure 33 and the agreement of the parties, plaintiff Tom Rider hereby offers the following objections and responses to Defendants’ First Set of Interrogatories to him.

DEFINITIONS

1. As used herein, “irrelevant” means not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

GENERAL OBJECTIONS

1. Mr. Rider’s general objections, as set forth herein, are to be considered continuing objections and responses to the specific Interrogatories that follow, even if not referred to in the objection and response to a specific Interrogatory. Mr. Rider’s objections and responses given herein shall not be construed to waive or preclude any objections he may later assert.



2. Mr. Rider objects to each Definition and Instruction and each Interrogatory to the extent that it is vague, ambiguous, overly broad, unduly burdensome, or seek irrelevant information.

3. Mr. Rider objects to each Definition and Instruction and each Interrogatory to the extent that it seeks to impose obligations on him beyond the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

4. Mr. Rider objects to each Definition and Instruction and each Interrogatory to the extent that it seeks information protected against disclosure by the attorney-client privilege, the work-product doctrine, or any other privilege, immunity, doctrine, or rule of confidentiality. Mr. Rider further objects to each Definition and Instruction, and each Interrogatory, to the extent it seeks disclosure of information that would violate the privacy or other rights of individuals or himself.

5. In responding to these Interrogatories, Mr. Rider does not waive the foregoing objections or the specific objections that are set forth in the responses to particular requests. In addition, Mr. Rider does not concede by responding that the information sought or produced is relevant to the subject matter of this action or is calculated to lead to the discovery of admissible evidence. Mr. Rider expressly reserves the right to object to further discovery into the subject matter of these Interrogatories and the right to object to the introduction into evidence of any of the information provided in response to the Interrogatories.

6. Although Mr. Rider has exercised due diligence in responding to the Interrogatories, without waiving the foregoing objections or the specific objections set forth in the responses to particular requests, Mr. Rider reserves the right to amend or supplement his

responses and objections to the Interrogatories if additional or different responsive information is discovered during discovery or otherwise hereafter.

7. Although Mr. Rider has exercised due diligence in responding to the Interrogatories, and has answered them to the best of his recollection, without waiving the foregoing objections or the specific objections set forth in the responses to particular interrogatories, there may be instances in which Mr. Rider used an incorrect name or other identifying information with respect to particular individuals or animals involved in a particular incident that did occur, or he used an incorrect date to describe a particular incident that did occur.

SPECIFIC OBJECTIONS TO DEFINITIONS

1. Mr. Rider objects to the definition of “describe” to the extent it seeks to impose discovery obligations exceeding those required by the applicable rules of civil procedure, and on the grounds that it is overly broad, unduly burdensome, oppressive, vexatious, and seeks irrelevant information.

2. Mr. Rider objects to the definition of “identify” to the extent it seeks to impose discovery obligations on him exceeding those required by the applicable rules of civil procedure, and on the grounds that it is overly broad, unduly burdensome, oppressive, vexatious, and seeks irrelevant information. In particular, where a business address is available for an individual identified, Mr. Rider objects to the instruction to provide a home address on the grounds that it invades personal privacy rights and seeks overly broad and irrelevant information.

RESPONSES

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Objections and Response to Interrogatory No. 2:

Mr. Rider objects to this Interrogatory on the grounds that it seeks information that is irrelevant because it has no bearing on Mr. Rider's knowledge about or experiences with the circus community, and because it is overly broad, unduly burdensome, and oppressive, because Mr. Rider cannot recall every job or volunteer position that he has held since he completed high school and the names of his supervisors for every such position and job. Mr. Rider further objects to this Interrogatory on the ground that it seeks privileged information that is protected by his right to privacy. Subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider answers this Interrogatory as follows:

I received my high school diploma in 1970. I then went to work for Caterpillar Tractor Co., as a chip wheeler, and worked the third, "grave yard" shift. I don't remember my supervisor's name. I quit Caterpillar after 7 months because they wouldn't change my job and I was union and I didn't want to clean out the machines. I got married in 1971, and worked at Baker Shoes in Sheraton Village selling women's shoes for a few months. After I got married, we had a child a year later, and shortly after that we left for California, and my wife worked for five years until 1978 when I got a job for Universal Studios, on the crew that was filming Centennial the mini series in Colorado. My supervisor was KT Ende, the assistant director. I was a glorified extra. I was also a railway porter at Centennial and did quite a few other jobs there. In 1980, I went to work for Pick Up Inc. Garbage Co, in Washington, IL, my supervisor was Lionel Shunt. After that, I believe I started work at Rider Trucking in 1981. At the end of 1980 or 81 I had my own truck, and in 1987 I quit driving trucks. In 1987-89 my wife worked, we had three kids at the time and I was taking care of them. In 1989, I worked at Walt Disney

World Epcot Center, as the third shift custodial host, I believe my supervisor's name was Greg. That was the first time I ever worked around elephants. They had them in back of the American Pavilion and I got over a few nights during lunch and tried to help clean up and look after them. I only worked there a short time because it was too far to go back and forth to work and it was very hard on my family. From 1990-95 my wife worked again and I stayed home and took care of the kids, and did some home schooling. In 1995, I got divorced, went and lived with my daughter for a while, and traveled. In 1997, I joined the Clyde Beatty Cole Brother Circus and worked for Brad Jewel. I started in Myrtle Beach, SC on Easter Sunday, and worked with that circus for 42 towns up to White Plains, NY. I quit in White Plains, NY after I saw them mistreat the elephant Pete. I went to work for Ringling Brothers and Barnum & Bailey Circus on June 3, 1997. During Winter Quarters, 1999, I got the opportunity to accompany three of the elephants I had worked with and become close to – Kamala, Meena, and Lechme – to Europe with Daniel Raffo who was working for Dick Chipperfield, Graham's father. Daniel paid me to help take care of the elephants. I worked for him until March, 2000. I quit because of the way Raffo and others who worked for the Chipperfields continued to mistreat the elephants. Since then, I have primarily been traveling around the country speaking out about the way elephants are mistreated in the circuses, and I have done some selling of crafts at flea markets.

Interrogatory No. 15:

Describe each complaint or report that you made to any person about the way that the defendants' elephants were treated while you were employed by defendants.

Objection and Response to Interrogatory No. 15:

Mr. Rider objects to this interrogatory on the ground that it is overly broad, unduly

burdensome, and oppressive. Mr Rider saw mistreatment of elephants virtually every day that he worked at Ringling Bros., from June 3, 1997 to November 25, 1999, and he often complained to his fellow workers about this mistreatment. He did not keep track of every time he complained, and those incidents are too numerous to recall. Nevertheless, subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider provides the following additional answer to this Interrogatory:

Sept. 3-7, 1997, Greenbay, WI. The elephants were inside, and getting hooked all the time. I was getting yelled at because I was complaining about people hooking the elephants.

Sept 17-21, 1997, Kansas City, MO. I complained about the elephants being hit.

Oct. 1-5, 1997, Detroit, MI. Jeff Pettigrew told me that if I didn't quit complaining about the handlers hitting and disciplining the elephants he was going to get me fired.

Jan. 28- Feb. 1, 1998, Asheville, NC. Jeff Pettigrew threatened my life because I was complaining about everybody hitting the elephants all the time.

Feb 11-15, 1998, Greensboro, NC. I went to the Union, because Randy Peterson threatened my job because I was complaining about people beating the elephants.

March 17-23, 1998, Uniondale, NY. I did a lot of complaining there about the animals being chained up all the time.

June 18-21, 1998, Lubbock, TX. I complained to Randy Peterson that Tony Rodriguez was hooking and hitting the elephants.

Jan 14-18, 1999, Jacksonville, FL. I went to Alex Vargas and asked him to do something about these guys beating the elephants all the time. He said there was nothing he could do, that this is "discipline," and the handlers were going to do it anyway.

June 23-27, 1999, Ottawa, Ontario, Canada. I was yelled at by Randy Peterson because I refused to hit the elephants with a bull hook when the elephants started fighting and broke down a fence. He threatened my job because I was complaining about him and the other handlers hitting the elephants.

July 2-11, 1999, Toronto, Ontario, Canada. I called the Union in St. Louis and I told them that my job had been threatened because they were beating the animals again.

I repeatedly complained on the train to anyone who would listen about the mistreatment of the elephants.

Interrogatory No. 16:

Describe the extent and nature of your contact with each and every elephant with which you worked while you worked for defendants, including the dates that you worked with that elephant.

Response to Interrogatory No. 16:

From June 3, 1997 until November 25, 1999, I worked each and every day, or traveled on the train, with the elephants, unless I had a day off. I worked with the following elephants: Roma – who in the beginning worked all the way until we played the Superdome in New Orleans, LA and then they took her down to Florida – Nicole, Mysore, Karen, Sophie, Jewel, Rebecca, Lutze, Susan, Zina, Kamala, Lechme, and Minnie. I was also around the baby elephants, including Benjamin, Shirley, Romeo, Juliatt, and the others who were touring with the Blue Unit when I was there.

The extent of working with these elephants consisted of being around them seven, eight, sometimes more hours each day depending on what was going on that day – feeding them, making sure they had water if they needed it, cleaning up after them, putting down sawdust, and making sure nobody got around them. I got to know the elephants very well, and grew to love them. I felt that my emotional feelings for those elephants, my love for those elephants, was shown by not striking them. When I was on the train it would be the same thing. I'd have to watch them during the runs, then I was up there by myself keeping them as content as I could. I had direct daily contact with those elephants. I looked forward to seeing them every day, I was very close to them, they got to me, in my blood. I loved the elephants, and I didn't want to see them harmed, but I saw it. Everyday I had to be there, and I showed them that I loved them, and I

believe they trusted me.

Interrogatory No. 17:

Describe each of your "observations" of elephants that you know, as alleged in Paragraph 23 of the complaint, since you left defendants' employ, including which elephants you observed.

Objection and Response to Interrogatory No. 17:

Mr. Rider objects to this interrogatory on the ground that it is overly broad, unduly burdensome, and oppressive. Mr Rider has seen Ringling Brothers' elephants on many occasions since he left defendants' employ, and he has also seen many of them on videotapes that others recorded. It is impossible and burdensome for him to describe each of his observations of those elephants. Nevertheless, subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider provides the following additional answer to this Interrogatory:

For the last four years, I have been traveling around the country to many of the towns that Ringling performs in. I observe the elephants whenever I am in a town at the same time that Ringling arrives. I can not recall every time I have seen any of the elephants since I left Ringling. I do remember seeing the elephants in Madison, Wisconsin (May 2001) swaying back and forth, and I felt sorry for them. I saw them in Atlanta Georgia (2002, 2003), Manchester, New Hampshire (September/October, 2003); Pittsburgh, Pennsylvania (2001). I see them in California because I am there quite a bit, I have seen them in LA. I've also observed the elephants from the Red Unit walking down the street many times in San Jose, CA. It is hard to go visit the Ringling elephants because I know what goes on, it's just very hard. In addition, I have been able to observe many of the Ringling elephants on videotape since I left the circus. (Plaintiffs are producing copies of all of those videotapes in response to defendants' document

production request).

Whenever I observe one of the elephants, they look so sad and miserable, it makes me sad. Because I know what kind of life they lead day in and day out – on the road all but two weeks every year, being chained most of the time, stuck on the train in small train cars, hit, poked, smacked, jabbed, hooked, and beat with bull hooks and other tools, being yelled at all the time, not getting much exercise, not being able to play with each other, getting hit and yelled at if they try to play together, or even if they move a little bit when they are supposed to be standing in a line together, the babies being taken away from their mothers. I also see the elephants swaying back and forth, back and forth, and this also makes me sad because I know this is what is called “stereotypic” behavior, it is the result of the elephants being mistreated and confined in the circus. Even though I love them and want to visit them, it is really hard for me to do so without feeling badly.

Interrogatory No. 24:

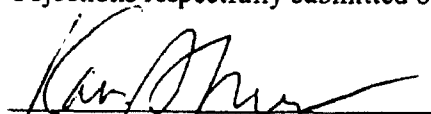
Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Objection and Response to Interrogatory No. 24:

Mr. Rider objects to this interrogatory on the grounds that it seeks information that is irrelevant, oppressive, and vexatious. Mr. Rider further objects to this Interrogatory on the ground that it seeks privileged information that is protected by his right to privacy and would infringe on his freedom of association. Subject to and without waiving the foregoing or general objections to these Interrogatories, and subject to a confidentiality agreement, Mr. Rider would be willing to provide defendants with the answer to the first sentence of this Interrogatory.

Subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider provides the following answer to the second sentence of this interrogatory: I have not received any such compensation.

Objections respectfully submitted by:



Katherine A. Meyer
(D.C. Bar No. 244301)

Eric R. Glitzenstein
(D.C. Bar No. 358287)

Kimberly D. Ockene
(D.C. Bar No. 461191)

Meyer & Glitzenstein
1601 Connecticut Ave., N.W.
Suite 700
Washington, D.C. 20009
(202) 588-5206

Date: June 9, 2004

VERIFICATION

CITY OF *San Marcos*)
COUNTY OF *San Diego*)
STATE OF CALIFORNIA)

TOM RIDER, being duly sworn, says:

I am a plaintiff in this case. I have read the foregoing objections and responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider and know the contents thereof; and, upon information and belief, said Objections and Responses are true and correct.

[Handwritten Signature]
TOM RIDER

Sworn to before me this
03rd day of *June*, 2004

[Handwritten Signature]
Notary Public



My Commission Expires:

10-28-2007

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| |) | |
| Defendants. |) | |

**PLAINTIFF TOM RIDER'S SUPPLEMENTAL RESPONSES
TO DEFENDANTS' FIRST SET OF INTERROGATORIES**

DEFINITIONS AND OBJECTIONS

1. Mr. Rider hereby incorporates by reference the definitions and general and specific objections that he made in his Objections and Responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider.

SUPPLEMENTAL RESPONSES

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Supplemental Response to Interrogatory No. 2:

Subject to and without waiving his previous objections to these Interrogatories, Mr. Rider states that before he completed high school he joined the military when he was 17 years old during the Vietnam War, and that he obtained his GED while he was in the military. Mr. Rider regards any further details concerning his military service to be extremely personal and, accordingly, he previously agreed to provide defendants with such information subject to a confidentiality agreement that would protect his personal privacy. However, because defendants have refused to agree to such an agreement, Mr. Rider has moved the Court to enter a protective order regarding this matter.

Although Mr. Rider does not consider his public education advocacy for the Wildlife Advocacy Project to be a "job," he nevertheless states, as he also testified about in his October 12, 2006 deposition, that he has received grants from that organization for his travel, living, and other expenses in connection with public education, media, and general advocacy work that he is doing on behalf of captive elephants. This effort includes contacting and speaking to journalists and others about the treatment of elephants in circuses, including the Ringling Bros. Circus, speaking to and assisting grassroots groups who are working on this and similar issues, and speaking to and testifying before federal, state, and local legislative entities about such matters. In furtherance of this effort, Mr. Rider travels throughout the country to the cities where the Ringling Bros. Circus performs and elsewhere.

Interrogatory No. 15:

Describe each complaint or report that you made to any person about the way that the defendants' elephants were treated while you were employed by defendants.

Supplemental Response to Interrogatory No. 15:

Mr. Rider has nothing further to add in response to this Interrogatory.

Interrogatory No. 16:

Describe the extent and nature of your contact with each and every elephant with which you worked while you worked for defendants, including the dates that you worked with that elephant.

Supplemental Response to Interrogatory No. 16:

Mr. Rider has nothing further to add in response to this Interrogatory

Interrogatory No. 17:

Describe each of your "observations" of elephants that you know, as alleged in Paragraph 23 of the complaint, since you left defendants' employ, including which elephants you observed.

Supplemental Response to Interrogatory No. 17:

Mr. Rider supplements his response to this Interrogatory by referring to his deposition testimony that he provided on October 12, 2006, in which he described the times when he has been able to visit the circus and see the elephants, including elephants on the Blue Unit. In addition he states the following:

Since June 2004, I have been able to observe many of the Ringling elephants on videotape, and I hereby incorporate all of the video footage of the Blue Unit that plaintiffs have produced since June 2004, which depict such animals. In addition, in October 2006 when I learned that Sophie was no longer with Ringling, I went to see her at the Naibo Zoo in Moline

Illinois. She was no longer chained and her handler did not use a bullhook on her. She came over to where I was standing, looked at ease, and was not swaying back and forth.

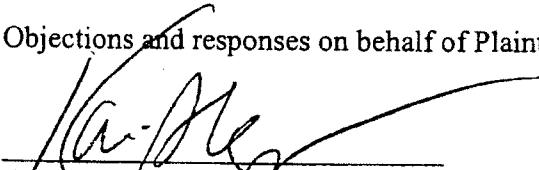
Interrogatory No. 24:

Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Supplemental Response to Interrogatory No. 24:

Subject to and without waiving his previous objections to this Interrogatory, Mr. Rider hereby incorporates by reference the deposition testimony that he provided on October 12, 2006, and reiterates that he has offered to provide defendants with a complete list of information that is responsive to this Interrogatory subject to a confidentiality agreement that would protect his personal privacy.

Objections and responses on behalf of Plaintiff by:



Katherine A. Meyer
(D.C. Bar No. 244301)
Tanya M. Sanerib
(D.C. Bar No. 473506)
Howard M. Crystal
(D.C. Bar No. 446189)

Meyer Glitzenstein & Crystal
1601 Connecticut Ave., N.W.
Suite 700
Washington, D.C. 20009
(202) 588-5206


Dated: January 31, 2007

VERIFICATION

CITY OF CHARLESTON)
)
)
)
)
 STATE OF South Carolina)

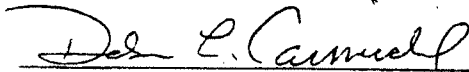
TOM RIDER, being duly sworn, says:

I am a plaintiff in this case. I have read the foregoing supplemental responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider and know the contents thereof, and, upon information and belief, said supplemental responses are true and correct.


TOM RIDER

Sworn to before me this

30th Day of January, 2007


DEBRA L. CARMICHAEL Notary Public
for State of South Carolina

My Commission Expires February 9, 2016

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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**PLAINTIFF TOM RIDER'S 2d SUPPLEMENTAL RESPONSES
TO DEFENDANTS' FIRST SET OF INTERROGATORIES**

These are Plaintiff Tom Rider's 2d Supplemental Responses to Defendant's First Set of Interrogatories, which are being provided pursuant to the Court's August 23, 2007 Discovery Order (Docket No. 178). All of the definitions and objections contained in Mr. Rider's earlier Interrogatory Responses apply here as well. Notwithstanding any of those general and specific objections, Mr. Rider is providing all of the information required by the Court's Order.

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Supplemental Response to Interrogatory No. 2:

Although I do not consider the media, legislative, and public education advocacy that I have done for any other organization to be a "job," I nevertheless state that I also performed the

same kind of advocacy for the Performing Animal Welfare Society ("PAWS") in 2000 - May, 2001; and I have done the same kind of advocacy for the ASPCA, the Fund for Animals ("FFA"), and the Animal Welfare Institute ("AWI"), since 2001 to the present, and for the Animal Protection Institute ("API") since about March 2006. I did similar advocacy on behalf of In Defense of Animals in the latter part of 2002 and beginning of 2003.

I also did some volunteer work (manual labor) for a couple of weeks in 2005 at a farm animal sanctuary in California called "Animal Acres;" and in February - May 2001 I watered some of the plants at an animal sanctuary in California called "ARK 2000" and also fed the wild turkeys and did some security work (watching the gate). In October 2003 I sold crafts at flea markets. I also drove a truck for Anderson Trucking Company for about two weeks in 1992 in Morton, Illinois.

Interrogatory No. 17:

Describe each of your "observations" of elephants that you know, as alleged in Paragraph 23 of the complaint, since you left defendants' employ, including which elephants you observed.

Supplemental Response to Interrogatory No. 17:

I saw some of the Blue Unit elephants in Charleston, West Virginia on about April 18, 2007; they were all chained.

Interrogatory No. 24:

Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Supplemental Response to Interrogatory No. 24

In March 2000, PAWS paid for an airline ticket for me to come to Galt, California so that I could be deposed by PAWS' attorney.

From March through December 2000, and January - February, 2001, I received approximately \$50 a week from PAWS to pay for my living expenses while I did media, legislative, and public advocacy for PAWS concerning the mistreatment of Asian elephants by the Ringling Brothers Circus. During this time PAWS also paid my motel bill at an inexpensive motel near Galt, California, and it paid for some airline tickets for me to go to Las Vegas,

Nevada to do media work; to attend a press conference in Phoenix Arizona; and to testify before the United States Congress in June 2000 regarding a bill to ban elephants in circuses, and to speak to officials at the United States Department of Agriculture about this matter. A copy of the 1099 from PAWS for 2000 is being produced, along with copies of documents showing some of the airline travel and the hotel bill for my stay in Washington, D.C. in June 2000. I did not receive a 1099 from PAWS for 2001.

In February 2001, I went to live on PAWS' sanctuary, "ARK 2000." I lived in a used motor home that PAWS provided to me, and PAWS continued to give me additional funds to pay for my living expenses – it was a little more than \$50 a week to account for the additional expense of gas for the motor home and a gas generator that I used for electricity, but I do not remember exactly how much it was. I continued to do media and legislative advocacy for PAWS as described above, and I also watered some of the plants at the sanctuary, fed the wild turkeys, and performed some security for PAWS by watching the gate.

Since May 2001, I have received grant money from other animal advocacy groups to do media and legislative advocacy and public education concerning the way elephants in circuses are treated. That funding has been used for my living expenses while I travel across the country to do this advocacy, first by Greyhound bus (I usually slept on the bus, but occasionally stayed in an inexpensive motel room), and then (and continuing to today) in a used van which I usually park in a camping ground or parking lot and sleep in (but sometimes stay in a motel room). Those expenses have included Greyhound bus tickets, hotel bills, camping registration fees, food, clothing, gas money, gas for a generator, and the other necessities of every day living – while I travel back and forth across the country and visit numerous cities each year to talk to reporters,

editors, producers, legislative bodies, grass roots groups, and individuals about what really goes on behind the scenes at the circus and the systematic daily abuse that the elephants must endure. The amount of grant money I have received from the Wildlife Advocacy Project ("WAP") for this advocacy is identified in the 1099s from that group which I am producing (Bates Labels: TR 457-461).

To the best of my recollection, over the last six and a half years I have received the following additional amounts of funding and other items for this advocacy from the following animal advocacy groups:

- ASPCA: approximately \$6,000; the ASPCA also paid for my cell phone for part of the year in 2002 and in 2003, and sometimes paid for hotel rooms for me; it also gave me a used lap top computer to use.
- AWI: approximately \$1,600; in addition, AWI paid for car repairs for my van in January, 2007
- FFA: approximately \$1,000
- API: approximately \$50.00; in addition API paid for a round-trip plane ticket so that I could go to Omaha, Nebraska in January 2006 to testify in support of legislation, and I believe that it also paid for my hotel room for 2 days while I was there.

In addition, during 2001 - 2003, I received approximately \$ 9,000 from the law firm Meyer & Glitzenstein that was reimbursed by the organizational plaintiffs for my expenses in connection with my media, legislative, and public education advocacy. I am producing the 1099 form that I received from Meyer & Glitzenstein that reflects part of this information (TR 00456); the plaintiff organizations are producing other documents concerning this information (F 04493-04516; AWI 09932-09939, 10054-10063); and the ASPCA documents that pertain to this information will be identified when the ASPCA submits its responsive documents.

From all other animal advocacy groups over the last seven years, other than the plaintiff groups, or WAP, I have received:

approximately \$25,350; plus one of those groups also paid for a round-trip train ticket for me to go from Los Angeles to Chicago in March 2006 so that I could speak to the City Council in support of legislation that would ban the use of bull hooks on elephants, and it also paid my hotel bill for 2 days while I was there; and another group paid for a plane ticket for me in July 2001 so that I could speak to the City Council of South Hampton, New York about proposed legislation concerning circuses.

None of these groups are parties to this lawsuit, attorneys for any of the parties, or employees or officers of any of the plaintiff organizations or WAP. See Order (Docket No. 178) at 3.

In July 2003, my attorney Katherine Meyer personally provided me approximately \$ 600 to pay for a round-trip plane ticket from San Francisco to Washington, Illinois, so that I could attend my sister's funeral.

In addition, over the last seven years, I received approximately \$ 7,690 from nine different individuals who could probably be described as "animal advocates." None of those individuals are parties to this lawsuit, attorneys for any of the parties, or employees or officers of any of the plaintiff organizations or WAP. See Order (Docket No. 178) at 3.

Pursuant to 26 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Tom E. Rider

9/24/2007

Date

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, <u>et al.</u> , |) | |
| |) | |
| |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| RINGLING BROS. AND BARNUM & BAILEY CIRCUS, <u>et al.</u> , |) | |
| |) | |
| Defendant. |) | |
| |) | |

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

**PLAINTIFF TOM RIDER'S SUPPLEMENTAL RESPONSES
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

These are Plaintiff Tom Rider's Supplemental Responses to Defendant's First Set of Interrogatories, and supplement all of his previous supplemental Interrogatory Responses. All of the definitions and objections contained in Mr. Rider's earlier Interrogatory Responses shall apply here as well. If Mr. Rider does not provide a supplemental response, this is because he has nothing to add to his previous responses.

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Supplemental Response to Interrogatory No. 2:

In further response to this Interrogatory, I hereby incorporate the answers I provided at my deposition on December 18 and 19, 2007.

Interrogatory No. 17:

Describe each of your "observations" of elephants that you know, as alleged in Paragraph 23 of the complaint, since you left defendants' employ, including which elephants you observed.

Supplemental Response to Interrogatory No. 17:

I supplement my response to this Interrogatory by incorporating by reference the deposition testimony that I provided on December 18-19, 2007, in which I described the times when I have been able to visit the circus and see the elephants, including elephants on the Blue Unit, as well as my response to Interrogatory No. 11 above.

In addition, since my deposition on December 18-19, 2007, I have had the opportunity to watch the video footage taken at the inspections that were held in November 2007 in Auburn Hills, Michigan and at the Center for Elephant Conservation in Polk City, Florida, and I have seen the following elephants in chains: Nicole, Karen, Lutzi, Susan, Jewell, Mysore, and Zina, and I have also seen many of these elephants rocking back and forth. All seven of the elephants look extremely depressed and unhappy, and lacking any spirit; they also are unable to socialize with the other elephants when they are chained.

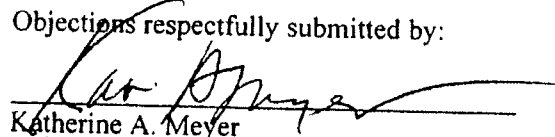
Interrogatory No. 24:

Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Supplemental Response to Interrogatory No. 24:

I hereby incorporate by reference the deposition testimony that I provided on December 18-19, 2007, and further state that since September 24, 2007 I have received for my media, legislative, and public education efforts \$ 7500 from the Wildlife Advocacy Project, and \$ 1250 from AWI. In addition, Katherine Meyer gave me an elephant tie when I came to Washington, D.C. to be deposed in December 2007, and she also sent me a gift basket of food for my birthday in October 2007.

Objections respectfully submitted by:



Katherine A. Meyer
(D.C. Bar No. 244301)
Kimberly D. Ockene
(D.C. Bar No. 461191)

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January 30, 2008