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On behalf of the Plaintiffs:

BY: KATHERINE ANNE MEYER, ESQ.  
Meyer Glitzenstein & Crystal  
1601 Connecticut Avenue, N.W.  
Suite 700  
Washington, D.C. 20009  
(202) 588-5206

On behalf of Defendant Feld Entertainment,  
Inc.:

BY: LISA ZEILER JOINER, ESQ.  
BY: MICHELLE C. PARDO, ESQ.  
Fulbright & Jaworski, LLP,  
801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 662-0200

and

BY: JULIE ALEXA STRAUSS, ESQ.  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, Virginia 22182  
(703) 448-4065

Also Present:

David Voigtsberger, Videographer  
Mary Bortscheller

+ + +

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C O N T E N T S

WITNESS: GEOFFREY PETTIGREW

EXAMINATION BY:	PAGE
MS. MEYER	5, 153
MS. JOINER	145

EXHIBITS

None.

1 the Plaintiffs.

2 MS. PARDO: Michelle Pardo for --

3 go ahead.

4 MS. BORTSCHELLER: Pardon me.

5 Mary Bortscheller for Plaintiffs.

6 MS. PARDO: Michelle Pardo for

7 Feld Entertainment.

8 MS. JOINER: Lisa Joiner, Feld

9 Entertainment.

10 MS. STRAUSS: Julie Strauss, Feld

11 Entertainment.

12 VIDEOGRAPHER: Court reporter,

13 please swear in the witness.

14 Whereupon,

15 GEOFFREY PETTIGREW

16 was called for examination by counsel and,

17 having been duly sworn by the Notary, was

18 examined and testified as follows:

19 EXAMINATION BY COUNSEL FOR PLAINTIFFS

20 BY MS. MEYER:

21 Q. Mr. Pettigrew, would you please

22 state your full name for the record?



1 A. Geoffrey Allen Pettigrew.

2 Q. And how do you spell Geoffrey?

3 A. G E O F F R E Y.

4 Q. And how do you spell Pettigrew?

5 A. P E T T I G R E W.

6 Q. Mr. Pettigrew, have you ever been  
7 deposed before?

8 A. No.

9 Q. I am going to be asking you a  
10 series of questions. And if you don't  
11 understand the question or need clarification,  
12 just ask me --

13 A. Yes, ma'am.

14 Q. -- and I will try to clarify it  
15 for you.

16 The other thing is please let me  
17 finish asking my --

18 A. Yes, ma'am.

19 Q. -- question before you start to  
20 answer it so that the court reporter can get  
21 it down, both the question and the answer. Do  
22 you understand that?

1 A. Yes, ma'am.

2 Q. Thank you.

3 Mr. Pettigrew, where were you  
4 born?

5 A. Waco, Texas, July 1st, 1961.

6 Q. And where do you currently live?

7 A. Gainesville, Florida. Actually  
8 Williston, Florida.

9 Q. How long have you lived in  
10 Williston, Florida?

11 A. Two years.

12 Q. And prior to that where did you  
13 live?

14 A. Plant City, Florida.

15 Q. I'm sorry?

16 A. Plant City, Florida.

17 Q. Klant City?

18 A. Uh-huh.

19 Q. And when did you live in Plant  
20 City?

21 A. Two years prior to living in  
22 Williston?

1 Q. When did you take the job as  
2 animal handler?

3 A. In the middle of '86.

4 Q. And that was also with the Blue  
5 Unit?

6 A. Yes, ma'am.

7 Q. And what was your job at that  
8 point in time?

9 A. To assist in cleaning the barn  
10 areas and taking care of the animals. To  
11 assist in any training that was going on. To  
12 assist in any type of care to help with the  
13 veterinarian care, also, when veterinarians  
14 were there.

15 Q. In 1985 when you took a job as an  
16 animal laborer, did you work with elephants at  
17 Feld Entertainment?

18 A. Yes.

19 Q. And in 1986 when you were promoted  
20 to animal handler, did you also work with  
21 elephants?

22 A. Yes.

1 Q. Did you work with other animals,  
2 as well?

3 A. Yes.

4 Q. What other species did you work  
5 with?

6 A. Horses, camels. And that's it.

7 Q. And how long did you hold the  
8 position of animal handler with the Blue Unit?

9 A. Until 1987.

10 Q. And then what job did you have?

11 A. I moved over to the Red Unit and  
12 worked as an elephant handler and also union  
13 representative.

14 Q. What were your job duties as an  
15 animal handler with the Red Unit in 1987?

16 A. To assist in taking care of the  
17 elephants, themselves, which consisted of  
18 taking care of the barn areas, setting up the  
19 barn areas, to assist in veterinarian care, to  
20 assist with the trainers.

21 Q. Who was the head elephant trainer  
22 with the Red Unit in 1987?



1 A. Gunther Gebel Williams.

2 Q. And what were your job  
3 responsibilities as the union representative  
4 at the Red Unit in 1987?

5 A. To tell fellow union members of  
6 the contract. To deal with any contract  
7 issues that the other union members had with  
8 the show. To file any grievances with the  
9 show that were in violation of the contract.  
10 To help assign rooms for the train. To  
11 negotiating contracts.

12 Q. Anything else?

13 A. No.

14 Q. How did you obtain that position  
15 as the union representative?

16 A. I was elected by the members of  
17 the union, of the union on the show.

18 Q. Which union were you the  
19 representative for?

20 A. Local 688 of the Teamsters Union.

21 Q. Which employees on the show did  
22 your union represent?

1           A.     The prop crews, the ring curb  
2 crews, the animal crews, the train crews, the  
3 wardrobe crews.

4           Q.     How long did you hold the position  
5 as union representative on the Red Unit?

6           A.     Until 1990 when I left.

7           Q.     During 1987 to 1990 on the Red  
8 Unit, what were your duties?

9           A.     I was an animal handler with  
10 elephants and other animals, and like I said,  
11 also a union representative.

12          Q.     So your duties basically remained  
13 the same between 1987 and 1990. Is that  
14 correct?

15          A.     Yes.

16          Q.     In 1990 where did you go after  
17 that?

18          A.     Went to work for Hawthorne  
19 Corporation.

20          Q.     Why did you leave Feld  
21 Entertainment?

22          A.     I had an opportunity to go work

1 A. The end of '94? Yes, the end of  
2 '94.

3 Q. When you were at Carson and Barnes  
4 did you have an opportunity to work with an  
5 individual named Tim Frisco?

6 A. No.

7 Q. Did you work with anybody with the  
8 last name of Frisco at Carson and Barnes?

9 A. No.

10 Q. In 1994 where did you go?

11 A. Fort Worth, Texas.

12 Q. And what was your job at Fort  
13 Worth, Texas?

14 A. I served as an animal control  
15 officer for the City of Fort Worth, Texas.

16 Q. What did that entail?

17 A. Maintaining -- not maintaining.  
18 Serving as a code enforcement officer for the  
19 city's animal code enforcement. Picking up  
20 stray animals. And serving as an investigator  
21 for bites, animal bites. And helping maintain  
22 the welfare laws that the city dictated.



1 Q. And what was his title?

2 A. I don't remember.

3 Q. He worked under Mr. Turner? Is  
4 that correct?

5 A. No, he was above Mr. Turner.

6 Q. So Mr. Ajjamon was the head of the  
7 department?

8 A. Yes.

9 Q. And then Mr. Turner was under  
10 Mr. Ajjamon?

11 A. Yes.

12 Q. And you worked under Mr. Turner?

13 A. Yes.

14 Q. How long did you hold that  
15 position?

16 A. Two years.

17 Q. During the time that you were an  
18 animal control officer at Fort Worth, Texas  
19 did you have any occasion to work with  
20 elephants?

21 A. No.

22 Q. Any exotic species at all?

1           A.     An opportunity on the Ringling  
2 show presented itself, and I wanted to get  
3 back to working with elephants.

4           Q.     Did you leave the job in Fort  
5 Worth on good terms?

6           A.     Yes.

7           Q.     So you quit your job in Fort  
8 Worth. Is that correct?

9           A.     I left on good terms. But I did  
10 leave.

11          Q.     Did you actually quit your job?

12          A.     Yes. I gave proper notice and  
13 then left.

14          Q.     And when you say an opportunity  
15 came up at the Ringling Brothers show, what  
16 was the opportunity?

17          A.     To work with the elephants again.  
18 They had came into town and I had friends  
19 there. They related to a position being open.  
20 So I reapplied for that, for the position to  
21 work with elephants again.

22          Q.     When you say they came into town,

1 they came to Fort Worth?

2 A. Yes.

3 Q. Was this the Blue Unit?

4 A. Yes.

5 Q. So when the circus came to Fort

6 Worth in 1995 you went to the circus?

7 A. Yes.

8 Q. And you said you had some friends

9 there. Is that correct?

10 A. Uh-huh.

11 Q. Who were the friends that you had?

12 A. (Pause.) God, I can't remember

13 their names. Just people that I associated

14 with when I was there before.

15 Q. You can't remember any of them?

16 A. No, no.

17 Q. How about Randy Peterson? Was he

18 one of them?

19 A. He wasn't there at that time.

20 Q. What was the job that you took

21 with Ringling Brothers in 1995?

22 A. Animal handler.

1 Q. And what were your duties?

2 A. To assist in any training. To  
3 assist in setting up the areas for the animals  
4 to be housed in. To assist with any vet care.

5 Q. Did you have these duties with  
6 respect to animals other than elephants?

7 A. No.

8 Q. So your duties as an animal  
9 handler in 1995 with the Blue Unit were only  
10 with respect to elephants. Is that correct?

11 A. Yes.

12 Q. Do you remember what salary you  
13 were paid in 1995?

14 A. No, I don't. If you look on the  
15 union contract at that time it will tell you.

16 Q. Who was the head elephant trainer  
17 for the Blue Unit in 1995 when you went back  
18 to work at Ringling Brothers?

19 A. Graham Thomas Chipperfield.

20 Q. Had you ever worked with  
21 Mr. Chipperfield before?

22 A. No.



1 conversations?

2 A. Yes.

3 Q. Do you remember who you had the  
4 conversations with?

5 A. No.

6 Q. Is that because it is just too  
7 long ago?

8 A. Yes.

9 Q. How long did you hold the position  
10 as animal handler with respect to elephants on  
11 the Blue Unit starting in 1995?

12 A. Until 2004.

13 Q. And during that time period did  
14 your duties on the Blue Unit change at all?

15 A. Only on one aspect. I was  
16 reelected to the union representative position  
17 by the majority of the Teamsters.

18 Q. When were you elected to that  
19 position?

20 A. 1997.

21 Q. Did you hold that position until  
22 you left in 2004?

1 A. Yes.

2 Q. Were your duties as the union  
3 representative between 1997 and 2004 any  
4 different than the duties as the union  
5 representative that you described earlier?

6 A. No.

7 Q. Who was your supervisor at the  
8 Blue Unit between 1995 and 2004?

9 A. Randy Peterson.

10 Q. Anyone else?

11 A. Brian Cristiani. Troy Metzler.

12 Q. Anyone else?

13 A. No, ma'am.

14 Q. When was Randy Peterson your  
15 supervisor? During what time period?

16 A. 1995 to '98.

17 Q. And what was his title during that  
18 time period?

19 A. Elephant -- actually, animal  
20 superintendent.

21 Q. So would he have been the  
22 supervisor for anyone else who was working on

1 the Blue Unit in 1999?

2 A. Actually, I was not -- yes. I was  
3 just trying to remember some dates.

4 Q. So for the years that I have  
5 covered, 1996, 1997, 1998, 1999, you toured,  
6 did the entire tour with the Blue Unit for  
7 those years. Is that correct?

8 A. Yes, ma'am.

9 Q. Can you tell me which elephants  
10 you worked with on the Blue Unit between 1995  
11 and 1999?

12 A. I can tell you some of them but  
13 not all of them.

14 Q. Okay.

15 A. Siam, Cora, Putzi, India,  
16 Calcutta. It is a long time ago. Nicole,  
17 Minyak, Birka.

18 Q. Birka, B I R K A?

19 A. I think so.

20 Susan. Lutzi, L U T Z. Mysore.  
21 Rebecca. Sophie. Karen.

22 I am trying to run down the line,



1 where they were at.

2 That's about it. That's about it.

3 Q. Okay.

4 A. That I worked with. Directly

5 worked with.

6 Q. Okay. How about Jewel?

7 A. Yes, Jewel, yes.

8 Q. How about Zina?

9 A. Yes.

10 Q. And when you said you were trying

11 to remember down the line where they were,

12 what do you mean by that?

13 A. Well, they would stand up in their

14 pens, and what elephants they would stand next

15 to, and what elephants they would be with.

16 Q. When you envision that, does that

17 help you to remember their names?

18 A. Yes.

19 Q. Did the elephants usually stand in

20 the same position?

21 A. They were usually with the same

22 elephants.

1           A.     He is currently working, I think,  
2     on the Blue Unit of the Ringling show. He  
3     also worked for Ms. Patty Zerbini for a period  
4     of time.

5           Q.     How do you know this?

6           A.     I currently work at the Williston  
7     retirement facility where Patty Zerbini houses  
8     her elephants. It is her winter quarters  
9     there. And I saw him with her.

10          Q.     It is your testimony that the next  
11     time you talked to Mr. French again after he  
12     left the Lowry Park Zoo in December of '05 was  
13     sometime in 2007? Is that correct?

14          A.     Yes.

15          Q.     What were the circumstances of  
16     that conversation?

17          A.     Hi, how are you? When did you go  
18     to work for Patty? Just general conversation.

19          Q.     So that conversation took place at  
20     Williston. Is that correct?

21          A.     Yes.

22          Q.     Why did you leave Lowry Park Zoo?

1           A.     The opportunity at Williston  
2 retirement facility arose and I had always  
3 wanted to work out there with older elephants,  
4 retired elephants, to further my education on  
5 elephants.

6           Q.     Had you applied for a job at  
7 Williston before?

8           A.     No.

9           Q.     You said you always wanted to work  
10 there.

11          A.     Yes.

12          Q.     But you had never applied for a  
13 job there before?

14          A.     No. The positions mostly were  
15 filled already. Then this position became  
16 open there.

17          Q.     How did you find out about that  
18 position coming open?

19          A.     Through word of mouth. Through  
20 people that I know who have worked with  
21 elephants and with performing elephants, and  
22 said that these positions, a position was open

1 up there.

2 Q. What was the position that was  
3 open?

4 A. Animal handler.

5 Q. And when did you take that  
6 position?

7 A. In '06. I think March of '06.

8 Q. So this was a job that you took  
9 immediately after leaving the Lowry Park Zoo?

10 A. Not immediately but in March of  
11 '06. I am pretty sure it was March.

12 Q. When did you leave Lowry Park Zoo?

13 A. December. Of '05.

14 Q. December of '05?

15 A. Yes, ma'am.

16 Q. What did you do between December  
17 of '05 and March of '06?

18 A. I worked in a tofu company,  
19 manufacturing tofu products.

20 Q. Where was that?

21 A. That is Plant City, Florida.

22 Q. So this was a job that you had



1 center. At that time he did not.

2 Q. When did you have that  
3 conversation with Mr. Jacobson?

4 A. '05.

5 Q. This is while you were still at  
6 Lowry Park?

7 A. No. This is after I had left  
8 Lowry Park. It would have to be December of  
9 '05, January of '06, right in that area.

10 Q. Did you make any effort to get  
11 rehired with one of the traveling units of the  
12 Ringling Brothers Circus?

13 A. No.

14 Q. And when you went to work at  
15 Williston in '06, what precisely were your  
16 duties?

17 A. Handling of the elephants,  
18 assisting in any vet care, caretaker of the  
19 property, facility side.

20 Q. When you say caretaker of the  
21 property, can you describe to me what the  
22 property consists of at Williston?

1           A.    I am not sure of the acreage but  
2   it is pretty large acreage. Consists of three  
3   barns, two large pen areas with night houses  
4   for two male elephants. Like I said, a lot of  
5   acreage. Holding pens for the elephants that  
6   are there. Three large ones behind the main  
7   barn area. One large one in front of the main  
8   barn area.

9                   Caretaking -- caretaking  
10  persisted of making sure fence lines were  
11  properly put up and maintained. Mowing the  
12  grass. Maintaining trees that were there.  
13  Basically, (unintelligible) a lawn service for  
14  it. Maintaining the facility, itself. If any  
15  water lines burst, I would, you know, fix  
16  those. If any pumps went out, if I could fix  
17  them I would. Pretty much a general farm work  
18  is basically what it curtailed, also, besides  
19  working with the elephants.

20           Q.    And were you employed by Feld  
21  Entertainment or Ms. Zerbini?

22           A.    Feld Entertainment.

1 Q. Are there some animals who are at  
2 the Williston facility who are owned by  
3 Ms. Zerbini?

4 A. Yes.

5 Q. Which animals are owned by  
6 Ms. Zerbini?

7 A. I can't tell you their names but  
8 she has five other elephants that are hers  
9 there also, housed in a separate barn area,  
10 two separate barn areas.

11 Q. Any other species?

12 A. Yes. Zebras; Sicilian donkeys; a  
13 bactrian camel, double-humped camel.

14 Q. Anything else?

15 A. That's it.

16 Q. All right.

17 A. The facility also houses some  
18 Ringling Feld Entertainment tigers, also.

19 Q. How many tigers, Feld  
20 Entertainment tigers, are there?

21 A. Three.

22 Q. What does their housing consist



1 benefits based on your employment with Feld  
2 Entertainment?

3 A. Yes.

4 Q. Do you get any other benefits in  
5 connection with your job with Feld  
6 Entertainment?

7 A. No, ma'am.

8 Q. Do you have any dealings at all  
9 with the CEC?

10 A. No, ma'am.

11 Q. Are you kept informed at all about  
12 what is going on at the CEC?

13 A. No, ma'am.

14 Q. Do you know Tom Rider?

15 A. Yes, ma'am.

16 Q. When did you meet him?

17 A. (Pause). '86, '87, '88.

18 Q. Could it have been in the '90s?

19 A. That's right. Excuse me. I'm

20 sorry.

21 Q. That's all right.

22 A. '96, '97, '98. I'm sorry.

1 Q. That's all right.

2 How did you meet him?

3 A. Mr. Rider applied for a position  
4 for work at the Ringling show and they brought  
5 him out to work with us with the elephants.

6 Q. What was his job?

7 A. He started out as just a laborer  
8 but, at the end of his work there, he was  
9 working as a barn man, which curtails him  
10 taking care of the barn while people are there  
11 and not there. Which means he is cleaning up  
12 behind the elephants, he is feeding the  
13 elephants.

14 Q. Did he spend a lot of time with  
15 the elephants in that capacity?

16 A. As the barn man?

17 Q. Yes.

18 A. On his eight hour shift, yes, he  
19 did.

20 Q. So you worked with Mr. Rider in  
21 1997? Is that correct?

22 A. Yes, ma'am.

1 Q. Did you also work with him in  
2 1998?

3 A. Yes, ma'am.

4 Q. And did you work with him in 1999?

5 A. No.

6 Q. Not at all?

7 A. No.

8 Q. Do you know who Mr. Rider's  
9 supervisor -- I am sorry, let's start with  
10 this.

11 A. Actually, yes, I did work with him  
12 in '99. I got my dates wrong. Yes, I did.

13 Q. Let's start over.

14 A. '98, '99 I did work with him.

15 Q. Just so the record is clear, so  
16 you worked with Mr. Rider in 1997. Is that  
17 correct?

18 A. Right.

19 Q. And you worked with him in 1998.  
20 Is that correct?

21 A. Yes, ma'am.

22 Q. And you worked with him for some



1 period of time in 1999.

2 A. Right.

3 Q. And when you worked with him, that  
4 was on the blue unit. Correct?

5 A. Yes, ma'am.

6 Q. Do you know who Mr. Rider's  
7 supervisor was on the Blue Unit when you  
8 worked with him between 1997 and 1999?

9 A. Randy Peterson.

10 Q. Did you ever have any  
11 conversations with Mr. Rider?

12 A. Mostly pertaining to work.

13 Q. Do you remember any of those  
14 conversations?

15 A. Not really. Not at all.

16 Q. Do you remember the circumstances  
17 under which Mr. Rider left the Blue Unit?

18 A. He had an opportunity to go with  
19 Daniel Raffo over to Europe with another  
20 person and he took the opportunity and went.

21 Q. And were there some elephants  
22 involved in that trip to Europe, as well?

1           A.     Yes, ma'am. Three of the  
2     Chipperfield elephants.

3           Q.     Do you remember the names of those  
4     elephants?

5           A.     No. I can one, Camilia. That's  
6     it. The other two I don't even remember.

7                     I pronounced it wrong, too. It is  
8     actually Kamala.

9           Q.     Did you have any opportunity to  
10    work directly with Mr. Rider?

11          A.     Yes, I did.

12          Q.     What were the circumstances of  
13    that?

14          A.     When Mr. Rider first started with  
15    us as a laborer, I worked directly with him,  
16    mucking out the barn areas, cleaning up around  
17    the elephants, feeding the elephants, helping  
18    set up exercise areas for the elephants, pen  
19    areas for the elephants.

20                     When he went into the barn man  
21    position, I indirectly worked with him when my  
22    work intersanked with his shift work. When he

1 worked there as a barn man he only worked  
2 eight hours a day, an eight hour shift.  
3 That's when I would -- work curtailed working  
4 on his shift, yes, I did.

5 Q. And do you have anything negative  
6 to say about Mr. Rider?

7 A. No.

8 Q. Did you know an individual named  
9 Frank Hagan?

10 A. Yes.

11 Q. How did you know him?

12 A. Through the show. Frank Hagan, if  
13 I recall, used to work with our prop crews and  
14 our transportation crews. Just interacting  
15 with him. I mean, I saw him at the show,  
16 talked with him, you know, at the show.  
17 Worked around him when we were moving cats in  
18 and out of the show. That's about it.

19 Q. Was this the Blue Unit you are  
20 speaking of?

21 A. Uh-huh.

22 Q. Did you have any conversations



1 (A recess was taken.)

2 VIDEOGRAPHER: We are back on the  
3 record at 12:57.

4 EXAMINATION BY COUNSEL FOR DEFENDANT

5 BY MS. PARDO:

6 Q. Good afternoon, Mr. Pettigrew.

7 You testified earlier that you  
8 were elected as a union representative during  
9 the 1997 to 1999 time period?

10 A. Yes, ma'am.

11 Q. As the union representative what  
12 were your duties?

13 A. To handle any contract issues  
14 between the union employees and the management  
15 of the show.

16 Q. Did you have any other duties with  
17 respect to that position?

18 A. The assignment of rooms on the  
19 train and that's about it right there.

20 Q. Was the barn man position one that  
21 was part of the union?

22 A. Yes, ma'am.



1 Q. As a union representative did you  
2 know whether a union employee could be fired  
3 for abusing animals?

4 A. Yes, ma'am, I did.

5 Q. And as the union representative do  
6 you know whether a union employee could be  
7 fired for complaining about animal abuse?

8 A. They cannot be fired for  
9 complaining.

10 Q. What were you required to do if a  
11 union employee complained?

12 A. Take the contract at the time,  
13 look through the contract for the grievance  
14 that the individual was complaining about,  
15 what part of the contract was being violated.  
16 If such thing was in the contract, I would  
17 have to go to the show management, show them  
18 the part of the contract that the employee was  
19 feeling was being violated, have the show act  
20 on this problem for a certain period of time.

21 If they did not act after that  
22 time was expired, I was to take it to the

1 union representative from the local, which was  
2 Dave Olimander (phonetic), and then the union  
3 issued to the show that they needed to take  
4 care of the problem and issued them a time  
5 frame. If it was not met at that time frame  
6 the union had the right to either strike the  
7 show or by work stoppage.

8 Q. During this time when you were the  
9 union representative in '97 to '99 Mr. Rider  
10 worked on the show. Is that correct?

11 A. Yes, ma'am.

12 Q. Did Tom Rider ever complain about  
13 the treatment of elephants to you?

14 A. No, ma'am.

15 Q. Did he ever complain about  
16 elephant mistreatment?

17 A. No, ma'am.

18 Q. What about elephant abuse?

19 A. No, ma'am.

20 Q. Do you know if he complained to  
21 anyone else on the unit about this?

22 A. No, ma'am, I don't.



1 Q. Now, you also testified that you  
2 worked with Mr. Rider?

3 A. Uh-huh.

4 Q. You had interactions with him?

5 A. Yes.

6 Q. Did Tom Rider complain to you  
7 about anything at all while you worked  
8 together?

9 A. The pay scale, the accommodations  
10 on the train. We have a clause in the  
11 contract of our day-offs. At the time he felt  
12 he was not receiving his due day off. And  
13 that's it.

14 Q. What did you do about those  
15 complaints, if anything?

16 A. Took them at issue, explained to  
17 him in the contract, showed him the contract  
18 of what issues he was talking about, explained  
19 the issues of the room to him that it was due  
20 to a seniority basis that these rooms were  
21 given to individuals. And that's it. I mean,  
22 just sat and let him look at the contract and

1 read what was -- what was the contract stated.

2 Q. During the time that you  
3 interacted with Mr. Rider while on the Blue  
4 Unit, did you ever observe Mr. Rider using a  
5 guide?

6 A. No.

7 Q. Was he permitted to use a guide?

8 A. Not to my knowledge.

9 Q. Was that part of his job  
10 description as far as you knew?

11 A. Not to my knowledge.

12 Q. How would you describe your  
13 working relationship with Mr. Rider?

14 A. Easygoing. He was always on time  
15 for the job. He worked -- he did his job to  
16 the best of his abilities.

17 Q. Did you take any issue with how he  
18 performed his job?

19 A. No.

20 Q. Did you have any criticism about  
21 his work?

22 A. No.



1 Q. Did you ever threaten Mr. Rider?

2 A. No.

3 Q. Did there come a time when  
4 Mr. Rider left the Blue Unit?

5 A. Yes, ma'am.

6 Q. Do you know if he was fired?

7 A. He was not fired.

8 Q. You explained earlier that you  
9 thought he left to go to Europe with Raffo.  
10 Is that correct?

11 A. Daniel Raffo, yes.

12 Q. How did you learn that  
13 information?

14 A. Through word of mouth. Also, on  
15 the day that they were leaving, he said he was  
16 going with them.

17 Q. To the best of your knowledge do  
18 you know if he told anyone he was leaving  
19 because of the treatment of elephants at  
20 Ringling?

21 A. I can't say. I don't know.

22 Q. Did he ever tell you he was

1 leaving because of the treatment of elephants  
2 at Ringling?

3 A. No.

4 Q. You testified previously that part  
5 of your job responsibilities was setting up  
6 exercise areas. Is that --

7 A. Uh-huh. Yes.

8 Q. Can you describe, during the '97  
9 to '99 time frame, how were the elephants on  
10 the Blue Unit exercised?

11 A. The morning routine was to come  
12 in, sweep off the elephants, hay off the  
13 elephants, muck out around the elephants,  
14 clean up the areas around the elephants.  
15 Myself and several other animal handlers and  
16 the lead elephant person would take the  
17 animals out of the barn between 8:30 and 9:00  
18 o'clock, per se. I am not really sure of the  
19 time. And we would walk either in the arenas  
20 for between 15 and 30 minutes or we would walk  
21 around the areas, animal areas themselves.

22 Q. You testified that there were pens

1 used during this time, as well?

2 A. Yes, ma'am.

3 Q. During the '97 to '99 time frame  
4 on the Blue Unit can you describe how pens  
5 were used?

6 A. When the space was provided for us  
7 we took them, the electronic barriers,  
8 electric fence barriers, around either the  
9 elephant yards or the elephant tents. The  
10 animals were turned out into these areas  
11 untethered and had free room to move around  
12 these pen areas, when space was provided.

13 Q. Now, counsel had asked you about  
14 other people that you worked with on the Blue  
15 Unit. Have you ever reviewed anyone's  
16 testimony in this case who worked on the Blue  
17 Unit?

18 A. No.

19 Q. Have you ever reviewed testimony  
20 of anyone else within the Feld Entertainment  
21 company's testimony?

22 A. No.



1 Q. So you don't have any idea how  
2 anyone previously testified in this case?

3 A. No.

4 MS. PARDO: I have nothing  
5 further.

6 EXAMINATION BY COUNSEL FOR PLAINTIFFS

7 BY MS. MEYER:

8 Q. Mr. Pettigrew, you said pens were  
9 used when space was provided for us. What did  
10 you mean by that?

11 A. When we first started using the  
12 electric fence pens, sometimes the buildings  
13 we played would not have adequate space enough  
14 for us to put the pens up how we wanted to put  
15 them up. We did put the pens up although we  
16 didn't have the space. But what I mean is we  
17 would use the space where the elephants were  
18 at as the space to put these pens up. If  
19 there was more room, we would use more room  
20 for these pens.

21 Q. As I understand your testimony,  
22 sometimes there just is not enough room to set