

Feld Entertainment, Inc.'s Responses and Counter Designations
FEI Exhibit 313A

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF COLUMBIA

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4 :
4 AMERICAN SOCIETY FOR THE :
5 PREVENTION OF CRUELTY TO :
5 ANIMALS, et al. :
6 :
6 Plaintiffs :
7 : Case No.
7 vs. : 03-2006 (EGS/JMF)
8 :
8 FELD ENTERTAINMENT, INC. :
9 :
9 Defendant :
10 :
10 -----x

11 Washington, D.C.
12 December 2, 2008

13 Videotaped Deposition of:

14 DANIEL RAFFO,
15 called for oral examination by counsel for
16 Plaintiffs, pursuant to notice, at the offices
17 of Meyer Glitzenstein & Crystal,
18 1601 Connecticut Avenue, N.W., Suite 700,
19 Washington, D.C., before Lynell C.S. Abbott, a
20 Notary Public in and for the District of
21 Columbia, beginning at 10:04 a.m., when were
22 present on behalf of the respective parties:



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On behalf of the Plaintiffs:

BY: KATHERINE MEYER, ESQ.
BY: WILLIAM EUBANKS, ESQ.
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(202)588-5206

On behalf of Defendant Feld Entertainment,
Inc.:

BY: JOHN SIMPSON, ESQ.
BY: MICHELLE C. PARDO, ESQ.
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and

BY: JULIE ALEXA STRAUSS, ESQ.
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Also Present:
David Voigtsberger, Videographer
Maria-Raquel McFadden, Interpreter

+ + +

1 Q. Yes.

2 A. At Ringling Brothers.

3 Q. When did you get a job at Ringling
4 Brothers?

5 A. They offered me a contract to come
6 back to Ringling Brothers for the season

7 2008-2009. So we talk about it, you know, "I

8 want you back over there. Can you come?" So

9 I say okay. I'm interested, so I come to the

10 States to work again in Ringling Brothers.

11 Q. Who did you talk to about coming
12 back to Ringling Brothers?

13 A. Again, Tim Holtz.

14 Q. And who initiated that discussion,
15 you or Mr. Holtz?

16 A. What discussion?

17 Q. About you coming back to Ringling
18 Brothers.

19 A. Well, he came to me. See, Tim,
20 Mr. Holtz, he travel all around the world
21 looking for performers, any kind, trapeze,
22 clowns, whatever, you know. So time to time I

1 A. It's about that time, the act.
2 It's not long now. You just go in and do the
3 stuff you do, the spindle stops. It's more
4 dancing around and girls dancing around and
5 tricks and stuff.

6 Q. Do you have occasion to actually
7 observe the elephant act?

8 A. From time to time I watch the act,
9 because my wife is there. So I see the act.

10 Q. Can you describe the act, the
11 elephant act to me that's used on the Blue
12 Unit right now?

13 A. They come in. They go around.
14 They go around. They go to the spindles.
15 They turn the spindles. They go in the top.
16 They sit up. It's very short. They lay down.
17 Everybody lay down and sit up in the floor.
18 And after that they go around and do a long
19 mount.

20 Q. A long mount?

21 A. Yeah, and that's it.

22 Q. Okay.