

Feld Entertainment, Inc.'s Responses and Counter Designations  
FEI Exhibit 317A

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.,

Defendants. /

**CERTIFIED  
COPY**

VIDEOTAPED DEPOSITION OF ROBERT RIDLEY

Friday, August 25, 2006

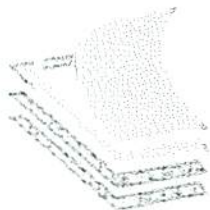
9:25 a.m.

CLARION HOTEL  
1355 N. Fourth Street  
San Jose, California 95112

Danielle Reading, CSR #10826

#06-350DR

**DEFENDANT'S  
EXHIBIT  
317A**



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A P P E A R A N C E S

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--o0o--

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 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 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 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 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 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 MS. PARDO: I'm going to object to the form.

2 Q BY MS. OCKENE: Does that sound like an accurate  
3 statement?

4 MS. PARDO: Are you asking him about  
12:25:27 5 multiple sentences?

6 MS. OCKENE: We'll take it sentence by  
7 sentence.

8 Q BY MS. OCKENE: Do you see where it says, "I  
9 have seen hook boils on some of the elephants"? It's  
10 the third -- it starts on the second line of the, I  
11 guess, the biggest paragraph.

12 A "I have seen hook boils on some of the  
13 elephants."

14 Q Does that sound like something you would say?

12:25:55 15 A Yes.

16 Q Okay. And then it says, "I have seen them on  
17 the side of the trunks and on the underside of the  
18 legs." Does that sound like an accurate statement  
19 that you would say?

12:26:07 20 A Yes.

21 Q Okay.

22 A In years past.

23 Q Okay. Are you -- are you suggesting that  
24 something has changed recently with respect to whether  
12:26:26 25 you see hook boils or the frequency with which you see

1 them?

2 A The frequency.

3 Q Okay. Can you tell me in what way the frequency  
4 has changed since 1999?

12:26:39 5 A There's -- there's probab- -- a lot less.

6 Q Okay. Now your testimony is that you see them  
7 about three to four times a month.

8 A Yes, with the whole herd of elephants.

9 Q Okay. About four lines from the bottom of that  
12:27:16 10 big middle paragraph in this exhibit, it says, "Karen  
11 could be dangerous only to new people and when  
12 chained." Does that sound like something you would  
13 say?

14 A Sometimes when she's chained she becomes a  
12:27:36 15 little bit aggravated that she's in one place.

16 Q Would you consider her to be dangerous?

17 A No.

18 Q So if this was, in fact, your signature and your  
19 statement, would you say that that's an incorrect  
12:27:53 20 statement?

21 A Yes.

22 Q Okay. Okay. So just to be clear, your  
23 testimony is that this may not be your signature on  
24 this document.

12:28:08 25 A No, the initialing is not mine.

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 THE WITNESS: Yeah, fine.

2 MS. OCKENE: Do you want to move?

3 THE WITNESS: This will be fine.

4 MS. OCKENE: I think we may need to go off  
13:45:59 5 the record for a second so I can get some help with  
6 this, unless anybody else wants to try.

7 VIDEO OPERATOR: Going off the record. The  
8 time is 1:45.

9 (Recess taken.)

10 VIDEO OPERATOR: Okay. We're back on the  
11 record. The time is 1:51.

12 MS. OCKENE: Mr. Ridley, I was just going to  
13 ask you a couple of questions about this video that  
14 has been marked Exhibit 4. I'm just going to play a  
13:51:52 15 segment of it, and then we'll stop it and ask a few  
16 questions.

17 THE WITNESS: Okay.

18 MS. PARDO: I'm going to object to the  
19 foundation for this.

13:52:00 20 MS. OCKENE: I'm sorry. What's the  
21 objection?

22 MS. PARDO: Object to the foundation.

23 MS. OCKENE: Foundation? Can you elaborate  
24 on that a little bit.

13:52:05 25 MS. PARDO: We don't know -- you haven't

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. . .