

EXHIBIT 22

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,

v.

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

Defendants.

Civ. No. 03-2006 (EGS)

**PLAINTIFF AMERICAN SOCIETY FOR PREVENTION
OF CRUELTY TO ANIMALS' RESPONSES AND
OBJECTIONS TO DEFENDANTS' FIRST SET OF INTERROGATORIES**

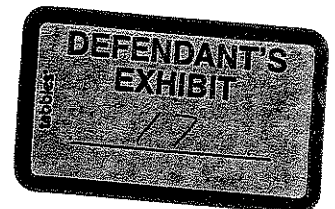
Pursuant to Federal Rule of Civil Procedure 33 and the agreement of the parties, plaintiff American Society for the Prevention of Cruelty to Animals ("ASPCA") hereby offers the following objections and responses to Defendants' First Set of Interrogatories to the ASPCA.

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. The ASPCA'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. The ASPCA's



10% of supporting expenses	\$ 4,000
Meyer & Glitzenstein	\$ 5,000
Media Relations (5% pf staff time to date)	\$15,000
Total for 2004 to date:	\$54,000
Total Resources Expended 1997 to the present:	\$683,654

Interrogatory No. 22:

Identify each expenditure from 1997 to the present of "financial and other resources" made while "pursuing alternative sources of information about defendants' actions and treatment of elephants" as alleged in the complaint.

Objection and Response to Interrogatory No. 22:

The ASPCA objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and calls for confidential financial information. Subject to and without waiving these and the general objections to these Interrogatories, the ASPCA states the following:

In 2000, the ASPCA spent about 5% of the time and benefits of the head of its D.C. Office, Nancy Blaney, as well as 5% of the overhead for that office gathering information from other organizations about Ringling Bros.' treatment of Asian elephants, culminating in the ASPCA's decision to become co-plaintiffs in this action: approximately \$13,000.

In 2001, the ASPCA gave The Wildlife Advocacy Project a grant for \$7,400 for public education about Ringling Bros.'s mistreatment of Asian elephants.

In 2002, the ASPCA spent a percentage of the salary and benefits for Lisa Weisberg – approximately \$12,000; plus \$ 7,568 for Freedom of Information Act litigation to obtain