

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.

:
:
:
:
:
:
:
:
:
:
:
:
:

Case No. 03-2006 (EGS/JMF)

MOTION TO COMPEL DOCUMENTS SUBPOENAED FROM THE
WILDLIFE ADVOCACY PROJECT AND MEMORANDUM OF POINTS
AND AUTHORITIES IN SUPPORT THEREOF

EXHIBIT 6

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,

v.

RINGLING BROTHERS AND BARNUM & BAILEY
CIRCUS, *et al.*,

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.

for this information, which I hereby incorporate by reference.

Interrogatory No. 23:

Describe each occasion since you left defendants' employ in which you have sought employment or volunteered your services to work with animals, and whether you secured the position you sought. If you did not secure the position and were given a reason for your rejection, provide that reason.

Response to Interrogatory No. 23:

None.

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.

Interrogatory No. 25:


Describe the subject and substance of the testimony that would be given by each person

VERIFICATION

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

TOM RIDER, being duly sworn, says:

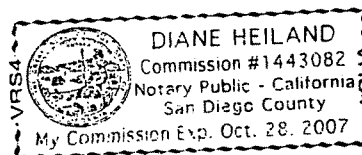
I am a plaintiff in this case. I have read the foregoing objections and responses to Defendants' First Set of Interrogatories to Plaintiff Tom Rider and know the contents thereof; and, upon information and belief, said Objections and Responses are true and correct.


TOM RIDER

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



Notary Public



My Commission Expires:

10-28-2007