

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION)	
OF CRUELTY TO ANIMALS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civ. No. 03-02006
)	(EGS)
RINGLING BROTHERS AND BARNUM & BAILEY)	
CIRCUS, <i>et al.</i> ,)	
)	
Defendants.)	

**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.

RESPONSES

Interrogatory No. 1:

Describe each and every job or volunteer position you have held with defendants.

Response to Interrogatory No. 1:

I was employed with Ringling Brothers from June 3, 1997 until November 25, 1999. I was hired to clean up around the elephants. After a few months, I took over the job of afternoon barn man, working from 3:30-10:30 cleaning up after the elephants and making sure they were fed. Nobody gets near the elephants, and, as Randy Peterson, my Superintendent, told me, as ordered from Ringling Brothers, I was not to take my eyes off the elephants, so I did not. I cleaned up around the elephants. I watched them approximately 8 sometimes 7 or 9 hours a day, sometimes all night depending on whether the other barn man showed up for work to relieve me. Basically my job was watching the elephants and cleaning up after them. My superintendent at the time I was hired was Graham Thomas Chipperfield. I also worked with Randy Peterson who took over Graham Chipperfield's position after Graham shot and killed the tiger Barney in St. Petersburg Florida and had to quit the circus. Randy Peterson took over, and at that point he became superintendent of the elephants. A little later, we were in Philadelphia and Adam Hill joined the circus. He was hired to be Randy's assistant – to be in charge of the barn before he was hired to actually present the elephants during the performances.

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Objections and Response to Interrogatory No. 2:

Mr. Rider objects to this Interrogatory on the grounds that it seeks information that is irrelevant because it has no bearing on Mr. Rider's knowledge about or experiences with the circus community, and because it is overly broad, unduly burdensome, and oppressive, because Mr. Rider cannot recall every job or volunteer position that he has held since he completed high school and the names of his supervisors for every such position and job. Mr. Rider further objects to this Interrogatory on the ground that it seeks privileged information that is protected by his right to privacy. Subject to and without waiving the foregoing or general objections to these Interrogatories, Mr. Rider answers this Interrogatory as follows:

I received my high school diploma in 1970. I then went to work for Caterpillar Tractor Co., as a chip wheeler, and worked the third, "grave yard" shift. I don't remember my supervisor's name. I quit Caterpillar after 7 months because they wouldn't change my job and I was union and I didn't want to clean out the machines. I got married in 1971, and worked at Baker Shoes in Sheraton Village selling women's shoes for a few months. After I got married, we had a child a year later, and shortly after that we left for California, and my wife worked for five years until 1978 when I got a job for Universal Studios, on the crew that was filming Centennial the mini series in Colorado. My supervisor was KT Ende, the assistant director. I was a glorified extra. I was also a railway porter at Centennial and did quite a few other jobs there. In 1980, I went to work for Pick Up Inc. Garbage Co, in Washington, IL, my supervisor was Lionel Shunt. After that, I believe I started work at Rider Trucking in 1981. At the end of 1980 or 81 I had my own truck, and in 1987 I quit driving trucks. In 1987-89 my wife worked, we had three kids at the time and I was taking care of them. In 1989, I worked at Walt Disney

World Epcot Center, as the third shift custodial host, I believe my supervisor's name was Greg. That was the first time I ever worked around elephants. They had them in back of the American Pavilion and I got over a few nights during lunch and tried to help clean up and look after them. I only worked there a short time because it was too far to go back and forth to work and it was very hard on my family. From 1990-95 my wife worked again and I stayed home and took care of the kids, and did some home schooling. In 1995, I got divorced, went and lived with my daughter for a while, and traveled. In 1997, I joined the Clyde Beatty Cole Brother Circus and worked for Brad Jewel. I started in Myrtle Beach, SC on Easter Sunday, and worked with that circus for 42 towns up to White Plains, NY. I quit in White Plains, NY after I saw them mistreat the elephant Pete. I went to work for Ringling Brothers and Barnum & Bailey Circus on June 3, 1997. During Winter Quarters, 1999, I got the opportunity to accompany three of the elephants I had worked with and become close to – Kamala, Meena, and Lechme – to Europe with Daniel Raffo who was working for Dick Chipperfield, Graham's father. Daniel paid me to help take care of the elephants. I worked for him until March, 2000. I quit because of the way Raffo and others who worked for the Chipperfields continued to mistreat the elephants. Since then, I have primarily been traveling around the country speaking out about the way elephants are mistreated in the circuses, and I have done some selling of crafts at flea markets.

Interrogatory No. 3:

Describe any training or experience you have in the treatment of Asian elephants, including but not limited to the use of an ankus or tethering Asian elephants, and describe that training or experience, including the employer that required you to take such training, if any.

Response to Interrogatory No. 3:

My first experience with elephants was at Disney World, as described above. I was just

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.

[Handwritten Signature]
TOM RIDER

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

[Handwritten Signature]

Notary Public



My Commission Expires:

10-28-2007