

PLAINTIFFS' EXHIBIT A
To Plaintiffs' Opposition to Defendants' Motion
For Summary Judgment
Civ. No. 03-2006 (EGS/JMF)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,)

v.)

2006 (EGS/JMF))

Civ. No. 03-

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

Defendants.)

DECLARATION OF DR. HENRY MELVYN RICHARDSON, D.V.M.

I, Dr. Mel Richardson, declare as follows:

1. I am a veterinarian with more than thirty-six years of professional experience that includes treating, observing, and caring for elephants, including both Asian and African elephants.

2. I am an exotic and small animal veterinarian having received my Doctorate of Veterinary Medicine (“DVM”) from the University of Georgia in 1982.

3. Since June of 2005 I have been a veterinarian for a clinic in Paradise, California and I also serve as a consulting veterinarian.

4. Before moving to California, I lived in Seattle, Washington where I was a relief veterinary, from January 1999 to June of 2005, for the Woodland Park

Zoo and The Point Defiance Zoo, both of which have Asian elephants.

5. Prior to that, I lived in San Antonio Texas where I first worked at the San Antonio Zoo, which has elephants, as a staff veterinarian from 1991 to 1995 and then was a staff veterinarian for an emergency pet clinic which provided emergency care for all pet species.

6. I have also previously worked as an associate veterinarian for the Woodland Park Zoo and for an organization called International Animal Exchange, where I provided veterinary care more than 2500 exotic animals, including Asian elephants.

7. Before becoming a veterinarian, I worked as a zookeeper at the Athens Memorial Zoo. I also worked as a keeper at the Atlanta Zoo, which has Asian elephants. I was a ranger at a facility called Lion Country Safari where I cared for and helped maintain elephants and other exotic animals.

8. I am a member of the American Veterinary Medical Association and the Veterinary Emergency and Critical Care Society, and I am licensed and accredited in Texas, Washington, and California.

9. I have read the Complaint in this case and am familiar with the claims made by the plaintiffs.

10. I have also reviewed the documents titled "Defendant's Motion for Summary Judgment," "Memorandum of Points and Authorities in Support of Defendant's Motion for Summary Judgment," Feld Entertainment Standards and Guidelines for Animal Care and Management, DX 2 (Declaration of Gary Jacobson), DX 3 (Declaration of Jerome Sowalsky), DX 4 (Elephant Husbandry Resource Guide excerpt), and DX 8 (Saunders Comprehensive Veterinary Dictionary excerpt).

11. Among the types of conduct that the plaintiffs in this case complain about is the routine beating and striking of elephants to train them, discipline them, and keep them under control, including the striking and hitting of elephants with bull hooks; the chaining of elephants for long periods of time; the breaking of baby elephants with enough force to make them submissive; and the forcible removal of baby elephants from their mothers with the use of ropes and chains.

12. Based on my experience with elephants and my knowledge of their biological, behavioral, and social needs, the types of conduct which the plaintiffs complain about are neither humane, nor healthful.

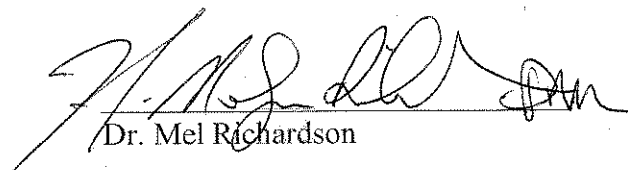
13. Based on my experience with elephants and my knowledge of their biological, behavioral, and social needs, the conduct about which plaintiffs complain does not constitute generally accepted or normal husbandry practices for the breeding or care of captive elephants.

14. The beating, striking, and hitting of elephants are not generally accepted normal elephant husbandry practices. Confining elephants on chains for most of the day and night is not a generally accepted or normal elephant husbandry practice. Forcing very young baby elephants from their mothers with the use of ropes and chains is not a generally accepted or normal husbandry practice.

15. Because husbandry does not include abuse, the inhumane practices which the plaintiffs are complaining about are not generally accepted or normal elephant husbandry practices and certainly are not necessary to have a successful breeding program for captive elephants.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED this 4th day of October, 2006


Dr. Mel Richardson