

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

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.,

**CERTIFIED
COPY**

Defendants. /

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



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1 Q With other animals?

2 A I don't know.

3 Q So what product replaced Wonder Dust?

4 A There was various creams that was used for the
5 elephants.

6 Q So can you tell me the names of any of the
7 products you would use to treat a puncture wound on an
8 elephant today?

9 A No. Whatever the veterinary technician told me.

10 Q Okay. What would typically cause a puncture
11 wound on an elephant?

12 A The browse or what's commonly referred to as a
13 bullhook.

14 Q As a bullhook?

15 A Yes. I prefer a stick or a guide.

16 Q Okay. But when you say -- when you use the term
17 "stick" or "guide," you are referring to what's also
18 known as a bullhook, correct?

19 A Yes.

20 Q Okay. How often do you see puncture wounds
21 caused by bullhooks?

22 A Probably three to four times a month. That's
23 with the whole herd of elephants.

24 Q And where do you typically see those puncture
wounds?

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
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.

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.

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?

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.

25 Q Yes. Okay. And is water continuously available