

EXHIBIT J

**MOTION FOR PARTIAL SUMMARY JUDGMENT BY
DEFENDANTS KATHERINE MEYER, ERIC GLITZENSTEIN, AND
MEYER GLITZENSTEIN & CRYSTAL**

Civ. No. 07-1532 (EGS/JMF)

Perron, Jeannie

From: Strauss, Julie [JStrauss@feldinc.com]
Sent: Monday, June 04, 2001 10:52 AM
To: Sowalsky, Jerry; Weinstein, Harris; Perron, Jeannie
Cc: Jones, Kayleen
Subject: FW: Ex-employee alleges abuse of elephants Ringling Bros. spokesw oman calls case 'meritless' - Harrisburg Patriot 6/1

> -----Original Message-----

> From: Hupart, Dan
> Sent: Monday, June 04, 2001 10:41 AM
> To: Bremner, Joe; Froemming, Richard; Huey, Rodney; Jonesco, A.J.;
> Kerley, Katherine; Maninger, Jenifer; melissa.falciani@ketchum.com;
> OrtMabry, Catherine; Peters, Craig; Pflughaupt, Barbara; Phillips, Molly;
> Quinn, Susan; Rosser, Melinda; Strauss, Julie; Wallenda, Lisa; Westacott,
> Sophie; Wilbee, Joanna; Willens, Todd
> Subject: Ex-employee alleges abuse of elephants Ringling Bros.
> spokeswoman calls case 'meritless' - Harrisburg Patriot 6/1

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> Ex-employee alleges abuse of elephants Ringling Bros. spokeswoman calls
> case 'meritless'
> Irvin Kittrell III

>
> 06/01/2001
> The Harrisburg Patriot
> FINAL
> Page B03
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> A former employee of Ringling Bros. and Barnum & Bailey Circus claims its
> handlers abuse performing elephants and has a tape showing the endangered
> Asian animals being struck.
> Thomas Rider joined American Society for the Prevention of Cruelty to
> Animals, Animal Welfare Institute and the Fund for Animals to sue Ringling
> Bros. in July 2000 under the Endangered Species Act, which prohibits the
> harming of any animal that is listed as endangered.
> The lawsuit, filed in federal court in Washington, D.C., contends Ringling
> Bros. routinely beats elephants to train them and chains them for long
> periods of time.
> "This is about the elephants, this isn't about me," said Rider who worked
> for the circus as an elephant keeper from 1997 to 1999. "I want to see the
> abuse stopped. If we win this lawsuit, Ringling Bros. would have to get
> rid of the elephants."
> Catherine Ort-Mabry, spokeswoman for the circus, called the lawsuit
> "meritless." She said Ringling Bros. moved to dismiss the lawsuit in late
> 2000. The motion is pending in court.
> "We believe the allegations ... to be unsubstantiated and to be
> contradicted by the findings from more than 40 inspections that federal,
> state and local officials have conducted in the last two years," she said.
> "We are committed to working to save the Asian elephant for future
> generations and to providing people everywhere an opportunity to see these
> animals for themselves."
> Rider's allegations come as the circus performs at Hershey Park Arena
> until Tuesday. Hershey Park spokesman Garrett Gallia said his company has
> heard of the lawsuit pending against Ringling Bros., but he was not aware
> of the specific allegation or the supporting facts of the complaint.
> "Ringling Bros. has told us that the complaint is meritless," Gallia said.
> "Ringling Bros. has assured us that they have the highest standards for
> the care of all their animals."
> Rider said he has witnessed some of the abuse.
> Rider worked as an elephant keeper for about 22 months, Ort-Mabry said.
> Rider, who left the circus on amicable terms, said most of the cruelty to

> the elephants is done by the handlers.
> "These elephants are beat on a daily basis," Rider said. "This is
> something the public needs to be made award of. If they do the slightest
> thing wrong, they get hit."
> Ort-Mabry said Rider never told the circus about the abuse while he was
> employed, something that Rider denies.
> "I did complain to Ringling Bros. and they did nothing," he said.
> Rider also produced a videotape of elephants being struck by circus
> employees. Ort-Mabry said she has seen the tape and the handlers who did
> strike the elephants were reprimanded.
> "We had our medical team go in and evaluate if the elephants were harmed
> physically or emotionally," she said. "The elephants are fine."
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