

EXHIBIT O

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

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

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

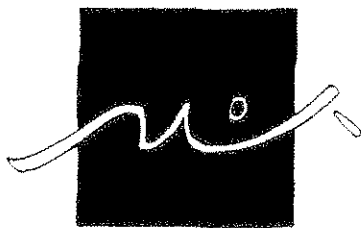
AMERICAN SOCIETY FOR THE)
PREVENTION OF CRUELTY TO)
ANIMALS, et al.,)
)
Plaintiff,)
v.)
)
RINGLING BROS., et al.,)
)
Defendants.)
_____)

**CERTIFIED
COPY**

Civil Action No. 00-1641
& 03-2006 (EGS)

Deposition of
EDWARD STEWART
Monday, August 16, 2004

Reported by: VICKI LOFTHUS, CSR #6160



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A P P E A R A N C E S

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FOR THE PLAINTIFF:

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1 MR. WOLSON: The latter objection is fine. As
2 to the former I don't know you need to make hearsay
3 objections on the record, beyond what will be admissible
4 at trial.

5 THE WITNESS: what was the question?

6 BY MR. WOLSON: Q. My question was did
7 Mr. Rider tell you what it was he had to talk about,
8 about circuses?

9 A. He said he had taken an elephant in a boat I think
10 across the ocean to Europe and that's all I remember.

11 Q. Do you remember what your response was?

12 A. No.

13 Q. Can you tell me who else was at that meeting?

14 A. No.

15 Q. Was Pat Derby there?

16 A. I don't know. I mean actually I might not even have
17 been there, I just remember that's what he was talking
18 about. I don't know when the meeting was.

19 Q. Did Mr. Rider come to work for PAWS at some point?

20 A. Well, I would guess you would say that, yeah.

21 Q. Why do you answer me as to say you guess you would
22 say that?

23 A. Well, I mean over time he did work for PAWS, yeah.

24 Q. What did he do for PAWS?

25 A. Watch man.

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EDWARD STEWART

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1 Q. A watch man?

2 A. Yeah.

3 Q. At one of the sanctuaries?

4 A. Yes, well, actually no, just at some property.

5 Q. Was it a regular employment position?

6 A. It was -- what do you mean regular?

7 Q. Did he have regular hours?

8 A. No.

9 Q. Did he work a regular shift?

10 A. He was, well, he sort of worked a regular shift, he
11 would be there on the property watching for intruders or
12 trespassers.

13 Q. Well, when you say he worked a regular shift, did he
14 have regular hours that he kept at the facility, was he
15 there on a daily basis?

16 A. He lived there. He lived there in a travel -- what
17 do you call it, an RV.

18 Q. And was he there daily working as a watch man?

19 A. Yes, but there were no animals there, that was
20 before we had anything built.

21 Q. So he was just watching the property?

22 A. Right.

23 Q. What was he watching for?

24 MS. MEYER: Asked and answered, I think.

25 THE WITNESS: Hunters, and anybody that would

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