

EXHIBIT R

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

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

Strauss, Julie

From: Williams, Peggy
Sent: Tuesday, November 04, 2003 3:13 AM
To: Strauss, Julie; Albert, Thomas
Subject: FW: From Linda Roberson

-----Original Message-----

From: Circusvern@aol.com [mailto:Circusvern@aol.com]
Sent: Sunday, November 02, 2003 10:47 PM
To: ColeBrosFan@aol.com
Subject: From Linda Roberson

Here is a bit of information about Mr. Rider. Hosted by ASPCA lawyer Jill Buckley, and sponsored by the ASPCA (and probably other AR organizations, because when I saw him in November of 2002 the Animal Defense League-L.A. was also present), Tom Rider has been touring the country giving the unsuspecting public the benefit of his "professional" experience as an elephant handler and trainer in the circus industry. If I recall correctly, the first time the public saw him as he embraced the new religion of animal rights, was at Pat Derby's PAWS facility on a TV program like Hard Copy.

(1) I saw Mr. Rider who spoke against the circus industry at the City Council meeting for Huntington Beach, CA. At that meeting, the ADL-LA brought its own aggrandized version of an elephant hook to brandish at the council persons. As always, I told the bailiff that they would be bringing one in and that Pamelyn Ferdin (ADL-LA) - who has already broken the collar bone of another peace officer with it - should be closely watched, and asked that the hook be held in the custody of the bailiffs at all times except during the 3 minutes she has to use it as her prop during her speech. I usually also try to get the bailiffs to stand at her elbow during her speech to protect people from her; she is very vehement. Also present at that meeting among about 35-50 other activists were Priscilla Gargalis and former Santa Clara County Humane Officer Christine Franco (now with L.A. animal control). The ban against performing exotic animals was passed in Huntington Beach, and the article about it was published in the local newspaper BEFORE the council's lawfully-required second vote on its legislation. Joining me to speak against the activists that night were Franklin Rosenberg and James J. Fitzpatrick of the Motion Picture Assoc. of America.

(2) Mr. Rider spoke at the UCLA Bohnett Animal Rights "Law" Series during which time he showed very damaging clandestine video of circus elephants on different shows and spent a lot of time raving about his adventures. This video is one that activists routine provide to city councils. (Essentially NO law was taught that night, and, I am working on having that series' MOLE accreditation cancelled but it has been very slow going). Also present at that seminar was animal rights activist Priscilla Gargalis with Pamelyn Ferdin Vlasak. If a member of the public had no idea about it one way or another - Mr. Rider's presentation could easily be considered VERY damaging to our industry.

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11/4/2003

Mr Rider has also been seen in front of circuses, lecturing in cities when a circus is performing there, and he has his own tour bus, and, I seem to recall that he appears with the PeTA media tv.

Linda Roberson

>From: Circusvern@aol.com
>To: ColeBrosFan@aol.com
>Subject: From Betty Bartholomew
>Date: Thu, 30 Oct 2003 21:37:01 EST

>
>Tom Rider showed up in Seattle, too. How he got a bull hook by security
>and
>into the Council Chambers was a breach of security. Somebody goofed. It
>would be interesting to hear from somebody in the know at Ringling as to
>what he
>was like on the lot. Did he quit? Or was he fired?

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