

EXHIBIT B

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

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

From: OrtMabry, Catherine
Sent: Tuesday, April 11, 2000 6:48 PM
To: 'goldston@sjmercury.com'
Subject: Answers to the questions you posed

Linda:

Tom Rider left Ringling Bros. of his own volition, and we understand that he left because he wanted to travel in Europe. We are surprised by the allegations because never in the time when he was employed by Ringling Bros. did Mr. Rider question or complain to a supervisor about animal care at Ringling Bros.

With regard to the questions posed below:

Does that mean you have no response to the allegations by local humane society investigators?

As you yourself said, the District Attorney reviewed the allegations, and the determination not to proceed speaks for itself.

what is your response to statements that your elephants are on road 49 to 50 weeks a year, on train for 16-18 hours a day for what amounts to about 30 minutes total of performance time in a day?

Elephants at Ringling Bros. are only tethered during feeding time, while preparing for performance and where required by law. The rest of the time we keep our elephants in exercise pens as much as possible. Ringling Bros. pioneered the use of electric fencing to create exercise pens.

I'd happily take a faxed copy of the necropsy report, since I know ya'll have one. All the documents, including the necropsy report, are public record through the USDA. That said, the report is a medical document; the quote in the article is in response to a question posed by the reporter. I would think that either the reporter or the veterinarian who performed the necropsy would speak with you about the findings.

respond to allegation that 69 of your employees left within 2 year period (those having to do with your traveling animal shows)

During the time described, 50 associates were separated from the entire Blue Unit animal crew either of their own volition or at the request of a manager (the crew is not broken out by species). It is important to know that the animal crew jobs are entry level positions and provide an opportunity for a person to prove his or her dedication, work ethic and commitment to the animals. If he or she does not perform satisfactorily, they are let go. However, of the 27 current members of the Blue Unit animal crew, 20 were active during the 1997-99 timeframe. What that means is that if someone works out, he tends to stay around for a while. The average length of employment on the Blue Unit animal crew is 3 years, and one has even been with us since 1968.