

EXHIBIT C

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

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

From: Galvin, Joan
Sent: Monday, May 22, 2000 9:01 AM
To: Strauss, Julie
Subject: FW: Tom Rider featured in Peoria newspaper article

fyi

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

From: Gaipo, Mark
Sent: Saturday, May 20, 2000 6:35 PM
To: Galvin, Joan; Froemming, Richard
Subject: FW: Tom Rider featured in Peoria newspaper article

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

From: OrtMabry, Catherine
Sent: Saturday, May 20, 2000 4:35 PM
To: Maxwell, Dale; Cimini, Pete; Boger, Rick; Gaipo, Mark
Cc: Wilbee, Joanna; Kerley, Katherine; Younger, Vanessa
Subject: Tom Rider featured in Peoria newspaper article

Dear All -

I wanted you to see this article about Tom Rider that ran in the Peoria paper. While I am quoted accurately, the headline is blatantly unfair and inaccurate, and the overall tone gives credibility to Tom's claims. I have also included the letter to the editor I sent today (my limit was 300 words, so it is short).

I anticipate that you will get questions from the local media about this - probably starting at the animal walk on Tuesday. You also may get questions at the training session that I think is scheduled for Friday. If you do, you can decline to comment by saying, "I don't know a lot about the situation you are asking about, but I do know about care here at RBBB." And then you can go into the normal messages about superior care, your life with the animals, our commitment to them, etc. Refer the reporter to Joanna Wilbee to talk about Tom.

Joanna will be in Peoria all week to work with Vanessa and the publicist and can do a lot of the interviews about our corporate policies and issues. She and I have discussed when I need to be brought in to help, and I will be available for whatever is needed. We are watching all of this carefully since the HR2929 hearing will be on June 13.

If you would brief Roy, Cindy, Mark and Larry, that would be great.

I hope all is well with you and I hope to see you soon.

Catherine

Circus elephants abused

5/20/2000

By **ELAINE HOPKINS <mailto:ehopkins@pjstar.com>**
of the Journal Star

Peoria native will trumpet pachyderm problem in hearings

PEORIA - A Peoria-area native hopes to tell Congress next month about the abuse of elephants he says

he has seen at circuses.

He claims they are routinely beaten with bullhooks and kept chained most of the time.

"Elephants are very sensitive and have almost the same feelings as humans," said Tom Rider, 49. "When you strike an elephant and hear it whining, it's no different from hitting a little kid."

Rider has become a volunteer for the Performing Animal Welfare Society, a California- based group that wants elephants banned from circuses.

He decided to speak out about his experiences working with elephants for the Ringling Bros. and Barnum & Bailey Circus and for other elephant handlers.

In June, he said, he expects to testify before a congressional committee on elephant abuse. The Captive Elephant Accident Prevention Act would ban elephants in traveling shows and also ban elephant rides.

The Ringling Bros. show opens in Peoria on Wednesday at the Civic Center.

Catherine Ort-Mabry, director of corporate communications for Feld Entertainment, the producers of Ringling Bros., said Rider is being used by the activist group and isn't telling the truth.

"We were surprised by these allegations. He never complained to his supervisor. We have ways to make anonymous comments because ultimately the care and treatment of animals is paramount. We want to know if something is amiss," she said.

"The types of allegations (Rider is making) would describe systemic abuse. If it existed, it would have been documented during 36 federal and state inspections that took place during his tenure with us," she said. "He could have taken his story to federal officials and didn't."

In a telephone interview, Rider, who grew up in Washington and lived and worked in Peoria, said he worked at various jobs throughout the United States before becoming a barn handler for elephants.

He worked for Ringling Bros. for 2½ years before quitting in November because of the alleged abuse. He then worked with elephants in Europe until March.

As a barn manager with Ringling Bros., he fed and cleaned up after the elephants eight hours daily. The elephant abuse varied depending on which men were in charge, he said. "It's a power thing."

His complaints to a supervisor about the beatings were ignored, or rationalized as "discipline," he said.

In one incident, he said, an elephant was so bloody that someone sprayed a product on the elephant's skin to turn the blood into a charcoal color. "It's a pretty good disguise."

Elephants would be beaten on the back of their heels and around their ears, he said.

"Some have deep scarring from years of being hooked behind the ears." The scars can be visible to a person close enough to see them, he said.

Government inspections are announced in advance, he said, and they are cursory.

Kitty Yanko of the Peoria Humane Society was among those who protested the circus last year in Peoria.

"Even if there are no beatings, even if we can't substantiate outright abuse," the constant traveling, "chained in small areas" is abusive to elephants, she said.

And here is my letter:

Dear Editor,

I'm writing to clarify some points that appeared in today's article about elephant care.

Your headline was patently unfair and inaccurate because it presented as fact the opinion of one source with questionable credibility even though you correctly qualified his opinions throughout the story. In fact, independent elephant experts who work with Ringling Bros. routinely report the elephants receive excellent care.

Contrary to Tom Rider's comments, he left Ringling Bros. to accompany some of the elephants he had been responsible for cleaning up after when they returned to Europe. At the time of his departure, he told the general manager that he was thankful for everything Ringling Bros. had done for him. As I told reporter Elaine Hopkins, we were surprised by Rider's allegations because he left amicably and had never mentioned any animal welfare concerns to company supervisors.

Contrary to a local animal activist's comments in the article, our elephants spend a majority of their time in most towns in open paddocks surrounded by fencing. When traveling, Ringling Bros. elephants ride in custom-built train cars that are designed for their comfort. In fact, most of our elephants sleep on the train - something no animal does unless completely comfortable with its environment. Finally, we meet or exceed federal, state and local regulations for animal care. In the future, we hope you will request comments about animal care from the Peoria Animal Welfare Society, which holds animal control authority in Peoria and has conducted unannounced inspections at Ringling Bros., rather than an animal activist group.

Sincerely,
Catherine Ort-Mabry
Director, Corporate Communications
Feld Entertainment

Editor's note: Feld Entertainment is the producer of Ringling Bros. and Barnum & Bailey. This letter is submitted for publication.