

**EXHIBIT GG**

**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

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AMERICAN SOCIETY FOR THE :  
PREVENTION OF CRUELTY TO :  
ANIMALS, et al., :  
Plaintiffs, : Case No. 03-2006(EGS)  
v. :  
RINGLING BROS. AND BARNUM & :  
BAILEY CIRCUS, et al., :  
Defendants. :

Washington, D.C.

Wednesday, May 18, 2005

Videotape Deposition of CATHY LISS, a  
30(b)(6) witness herein, called for examination by  
counsel for Defendants in the above-entitled matter,  
pursuant to notice, the witness being duly sworn by  
SUSAN L. CIMINELLI, a Notary Public in and for the  
District of Columbia, taken at the offices of  
Covington & Burling, 1201 Pennsylvania Avenue, N.W.,  
Washington, D.C., at 9:38 a.m., Wednesday, May 18,  
2005, and the proceedings being taken down by  
Stenotype by SUSAN L. CIMINELLI, CRR, RPR, and  
transcribed under her direction.

Certified Copy

1 APPEARANCES:

2

3 On behalf of the Defendants:

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10 On behalf of the Plaintiffs:

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18

19 ALSO PRESENT:

20 ELLEN HEBERT, Videographer

21 MIKE SONGER

22

23

24

25

## 1 C O N T E N T S

2	WITNESS	EXAMINATION BY COUNSEL FOR	
3	CATHY LISS	PLAINTIFFS	DEFENDANTS
4	By Mr. Wolson		6
5	By Ms. Ockene	211	

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16		Institute's website	
17	4	AWI's annual report for year	45
18		July 1, 2002 to June 30, 2003	
19	5	Plaintiffs American Society for the	50
20		Prevention of Cruelty to Animals'	
21		Fund for Animals and Animal Welfare	
22		Institute's responses and objections	
23		to defendants' first set of document	
24		Production requests	

25

1 Q. Who was there from the ASPCA?

2 A. Lisa Weissberg.

3 Q. Who was there from Fund for Animals?

4 A. Mike Markarian.

5 Q. Anyone else? Not from the Fund in  
6 particular, but was there anyone else in general  
7 there?

8 A. Our counsel.

9 Q. Ms. Meyer?

10 A. Yes.

11 Q. Anyone else?

12 A. I don't recall who else was present.

13 Q. How long did that meeting last?

14 A. Couple hours at most.

15 Q. Are there any other occasions on which you  
16 met Mr. Rider?

17 A. No.

18 Q. Does Mr. Rider ever work for AWI?

19 A. No.

20 Q. Has Animal Welfare Institute ever paid  
21 Mr. Rider any money?

22 A. Yes.

23 Q. How much did they pay him?

24 A. Couple thousand dollars.

25 Q. When was that?

1 A. Over the course of five years. Roughly  
2 from 2000 forward.

3 Q. Are you still making payments to him?

4 A. No.

5 Q. When was the last time you made a payment  
6 to him?

7 MS. OCKENE: Objection to the  
8 characterization that there were payments on some  
9 schedule.

10 MR. WOLSON: I don't think I made that  
11 characterization.

12 MS. OCKENE: I'm still objecting to the  
13 form.

14 THE WITNESS: We have no plans to give him  
15 additional moneys at this time.

16 BY MR. WOLSON:

17 Q. Well, my question was when was the last  
18 time you made a payment to him?

19 A. At some point in 2005. I don't recall the  
20 date specifically.

21 Q. So within the last four an a half months?

22 A. Yes.

23 Q. What were you paying him for?

24 A. For public education.

25 Q. What do you mean by public education?

1 A. For him to do -- to speak at events.

2 Q. What events has he spoken at on behalf of  
3 AWI?

4 A. He has never spoken on behalf of AWI.

5 Q. What events has AWI paid him to speak at?

6 A. We haven't paid him -- we paid his  
7 transportation costs so that he could go to Atlanta,  
8 for example, to speak.

9 Q. Okay. Tell me all the events for which  
10 you paid his transportation costs so he could go  
11 speak.

12 A. I couldn't tell you. It's not very many.

13 Q. What do you mean by not very many? How  
14 many are we talking about?

15 A. Given that the -- it's \$2,000 for a hotel  
16 and transportation, it doesn't go very far. Maybe  
17 three.

18 Q. How did you decide when to, when to pay  
19 for Mr. Rider's -- let me rephrase that. Has it been  
20 at your request that Mr. Rider has gone to speak at  
21 these events?

22 A. Yes.

23 Q. And why have you decided to ask Mr. Rider  
24 to speak at these particular events?

25 A. They were in conjunction with appearances

1 of the circus and we thought it was important to  
2 educate the public about what he observed.

3 Q. And when you say the circus, do you mean  
4 specifically Ringling Bros.?

5 A. Yes.

6 Q. So you paid Mr. Rider's expense -- travel  
7 expenses to go speak about Ringling Bros. in cities  
8 where Ringling Bros. was performing?

9 A. That's correct. We contributed towards.  
10 Yes.

11 Q. Was it always at your initiative that you  
12 contributed towards it?

13 A. No.

14 Q. Whose initiative was it?

15 A. It might have been his, too.

16 Q. He approached you to ask you to  
17 contribute?

18 A. Yes.

19 Q. Has he ever asked for anything more than  
20 his travel expenses?

21 A. No.

22 Q. Is all the money that you paid him for  
23 travel expenses?

24 A. Yes.

25 Q. On the times that you've reimbursed him,



1 are you, has it been only the Animal Welfare  
2 Institute that was paying for his travel expenses?

3 A. To my knowledge. Yes.

4 Q. You're not aware that you were sharing his  
5 expenses with some other organization?

6 A. That's correct.

7 Q. The first time that you paid Mr. Rider to  
8 do this, or reimbursed him to do this, was it after  
9 you filed this lawsuit?

10 A. Yes.

11 Q. Have you ever provided him with any  
12 nonmonetary compensation?

13 A. No.

14 Q. Does he make his own travel arrangements  
15 or do you make them for him?

16 A. He does them.

17 MS. OCKENE: Speak up a little bit.

18 THE WITNESS: Pardon? Oh, sorry.

19 BY MR. WOLSON:

20 Q. Do you know if any other animal welfare  
21 organizations have provided similar reimbursements to  
22 Mr. Rider?

23 A. I don't know.

24 Q. You never discussed it with him?

25 A. I imagine -- I don't know.

1 Q. And the occasions that he has spoken where  
2 you've reimbursed him, the small number of occasions,  
3 have you discussed with him beforehand what he will  
4 say?

5 A. No.

6 Q. Have you discussed his travel plans with  
7 him at all?

8 A. To a limited extent.

9 Q. What is the extent of your discussion?

10 A. Just confirming dates that he would be  
11 there and that would be it.

12 Q. Does he submit you receipts before you  
13 reimburse him?

14 A. No. And these aren't reimbursements. We  
15 paid him before he went.

16 Q. You prepay his travel expenses?

17 A. Yes.

18 Q. Do you pay him or do you pay the -- do you  
19 prepay for instance the airline ticket?

20 A. No. Well, he doesn't typically travel by  
21 air. This is --

22 Q. Just as an example more than a specific,  
23 but I mean, do you pay the hotel directly or do you  
24 pay him?

25 A. We pay him.

1 Q. Well, that -- okay. Aside from confirming  
2 sort of logistical arrangements for him, have you had  
3 any other discussions about these speeches he is  
4 going to give or these appearances he is going to  
5 make?

6 A. No. I mean, for one we prepared with our  
7 staff a press release, so that we did talk with him  
8 about it.

9 Q. A press release on behalf of the Animal  
10 Welfare Institute?

11 A. Yes.

12 Q. Not on his behalf?

13 A. On behalf of all the plaintiffs.

14 Q. When was that?

15 A. I believe that was a payment that was this  
16 year in Atlanta.

17 Q. I guess I asked you about meetings with  
18 Mr. Rider and we talked about two, one in probably  
19 2000 or 2001 and one more recently. Have there been  
20 other, other than the times that you've talked to him  
21 about sort of his logistical arrangements for travel,  
22 have there been other conversations or communications  
23 with him?

24 A. Only as plaintiffs.

25 MS. OCKENE: Don't answer to the extent