

EXHIBIT G

**MOTION FOR PARTIAL SUMMARY JUDGMENT BY
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MEYER GLITZENSTEIN & CRYSTAL**

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

Jones, Kayleen

From: Picard, Lisa
Sent: Tuesday, April 11, 2000 3:15 PM
To: Jones, Kayleen
Subject: FW: 9,000 MILES OF HELL; TORMENT OF CIRCUS ELEPHANTS EXPOSED
Importance: High

Kayleen - here's the story I promised you yesterday. For Julie's files.

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HEADLINE: 9,000 MILES OF HELL;
TORMENT OF CIRCUS ELEPHANTS EXPOSED

BYLINE: Christian Fraser In Aschaffenburg, Germany, And Jeremy Armstrong

BODY:

A CHIPPERFIELD circus worker last night lifted the lid on the catalogue of cruelty his animals were forced to endure.

American Tom Rider travelled 9,000 miles with three Indian elephants and 13 tigers in a four-month nightmare journey from the US across Europe.

The beasts were shipped in tiny, dark cages and forced to stand end to end surrounded by their own waste. They were beaten if they failed to perform.

Elephant handler Tom, 49, worked with Dickie Chipperfield, cousin of Mary Chipperfield, his son Graham, and trainers Daniel Raffo and Martin Lacey jnr.

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He claimed Dickie was so obsessed with money he demanded that "beastwagons" carrying the helpless animals be driven day and night between venues without a proper break.

Tom said: ""I couldn't bear to watch the cruel treatment any longer. Dickie has to be stopped. "What he has done is terrible. I want to expose him.""

Dickie, 57, has a previous conviction for cruelty. Last year The Mirror ran a series of articles exposing cruelty by Mary and Dickie. She was fined for beating a baby chimp called Trudy in her care.

The elephants, Leila, Mina and Camilla, are now thought to be with a German circus. They have made the world-famous circus family tens of thousands of pounds, from circus shows around the world.

Here, Tom tells of their needless suffering - and we will be handing our dossier of cruelty to the Home Office.

NOV 18: TAMPA, FLORIDA

Gruelling 350-mile journey. Animals' container was 8ft wide by 27ft long. I had to squeeze between "the girls" and the wall just to get in as they were staggered diagonally, crammed in.

They stayed locked in lorry for two days. Leila, who the keepers nicknamed Letchmai, was facing the front, Mina in the middle and Camilla at the back. Fed and watered once.

Nov 20-27: Carolina

First time elephants came out was on the boat in Charleston.

Exercise booth was barely large enough to house one, never mind three. We squeezed them out for 20 minutes.

As the boat began to move they grew more restless. Daniel put them back in the container in case they got out. They would not come out again.

There were 16 cats on the trip - including three cubs.

Their truck was nothing but a cage. It's 53ft long, four metres tall. The cages inside were eight foot by four. Cages housed two or even four at a time. The cats were only taken out to perform.

Nov 28: Algeciras, Spain

Elephants were in the worst state I had seen them in on arrival, kicking and shoving the doors to get out.

We set them loose in container yard for 20 minutes. Put them back as they tried to break through the fence. The underside of bodies were shaking, twitching with stress. Here for four days. They came out twice.

Our supplies reduced, elephants will be living off hay.

DEC 2-5 AMSTERDAM TRIP

Elephants back in the truck. Watered only twice on trip.

We used up the carrots and apples Dickie let us keep. Gave them two bales of hay a day, told Dickie I needed more. He insisted it was all they were getting.

Dec 5-12 Amsterdam

Damp and raining. So cold you could see your breath. Elephants, hate cold. Taken out for one day for 20 mins.

Poor conditions. Floor in the truck had holes in it, and they filled up with sawdust, dung, everything packed in, couldn't clean it up. Water on the side of the truck turning to ice. Total lack of exercise - 25 minutes in Amsterdam. Five days from Algeciras before they got out.

Raining, but they still should have come out. No vet checks on the first leg of the trip. First vet we saw was in January in Germany. Only person checking the condition of elephants was me.

Letchmai isn't supposed to work. She has arthritis. First time I heard about The Mirror was in Amsterdam. I asked Dickie if we were working in Holland. He said: "No. We are hiding out from The Mirror."

DEC 12-14 FRANCE

Journey to Fort Bernard, south of Paris.

Elephants thirsty. Drank three 55-gallon barrels of water. Would drink that in a day. The floor of the lorry and the floorboards had to go in the back, so the girls could not move at all.

For 35 days they were confined in a space five-feet smaller than it should have been. Dickie and I drove elephants.

Mina wouldn't come out of the truck. Dickie screamed at her but she wouldn't budge, too frightened. He got a truck and tried to drag her out with a chain.

It was a 3ft drop. When she hit the floor she started running into a yard where circus was set up. (Dickie denies using vehicle.)

Dec 14-16 Ft Bernard

First time I saw Dickie use a bull hook and electric prong to control elephants in rehearsals. Dickie told Martin to give them a command. If they didn't respond, to give it to them a little heavier in a deeper voice. If they still didn't respond, he would let them have it with the hook. "Get into em," he'd say.

From December 16 to 19, we were based on a farm at La Bezoche Gouet, Paris.

There was snow, so elephants stuck in truck for four days.

Dec 19-20 to Dresden

Chipperfield stressed out. To him, it is all money. He doesn't care about animals, just making some more and moving on.

We left France just before dark and we arrived at Circus Barelli the following night.

Dickie was driving by himself, constantly crossing the centre line, veering back and forth. The elephants would have been slammed against the wall.

He was popping Vivren tablets, 200 mg of caffeine. His motivation seemed to be to get there, get the tent set up and leave.

Dec 21-Jan 9 Dresden

They kept them in the tent, chained up, the second night in Dresden. No heater.

In rehearsals, Dickie would use both hands yanking at them with the hook.

Letchmai was used even though she was declared as having arthritis the previous year.

Animals were chained up from 9am to 8.15pm, no movement.

In ring, Dickie was using a hand-held stun gun on elephants.

You could hear them whine when they were hit. He also used what I called the "Chipperfield hook", 36 inches long and a quarter of inches wide.

Dickie used the hook behind the ear, legs, legs, trunk and chin. They were left with blood dripping.

They would use the "zapper" electric shock as well, both If the elephants were not moving, when Mina did not move fast Martin would hit her with the hook around the head.

After the show he started beating Camilla because the act had not gone right.

On January 9 left Dresden to Massy, Paris. Only stopped once to water the animals. One hour's sleep.

Arrived in Massy, Paris on Jan 11. Very, very cold, wind blowing through the elephants' tents.

The girls were shaking all the time. Told Dickie and he bought a heater. Couldn't get it to work. So he borrowed one.

Drove to winter quarters near Gottingen, Germany on February 4.: Two days to get there. Stopped only once to water animals.

Elephants kept in the dark when we arrived. Not exercised. Girls kept in leg chains unable to move more than three feet. Drove to Frankfurt for February 13. Truck broke down so got a break.

Stayed in Frankfurt until March 12.

I decided to leave for England.

Counted the marks on the elephants legs from the hook. There were 72 on Meena's front right leg, 36 on the back, 27 on Camilla's front left leg, nine on back right leg and marks behind her ear. Wounds were bleeding.

Dickie told me that when Mary lost her licence for cruelty, all her animals went to him. He should never allowed to keep animals again.

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GRAPHIC: HORRIFIED: Chipperfield worker Tom; GRIM: Hosed in freezing weather; GLOOM: Jumbos kept in darkened tent; MISERY: The elephants on their ship voyage - for seven days they stood without exercise in their own waste Pictures; TOM RIDER

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