

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FELD ENTERTAINMENT, INC.

Plaintiff,

v.

Case No. 07- 1532 (EGS)

**AMERICAN SOCIETY FOR THE
PREVENTION OF CRUELTY
ANIMALS, et al.**

Defendants.

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**PLAINTIFF’S OPPOSITION TO DEFENDANTS’ MOTION TO TEMPORARILY STAY
ALL PROCEEDINGS**

EXHIBIT 15

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION)	
OF CRUELTY TO ANIMALS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civ. No. 03-2006 (EGS/JMF)
)	
RINGLING BROTHERS AND BARNUM & BAILEY)	
CIRCUS, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF TOM RIDER

1. I am one of the plaintiffs in this case. I am submitting this declaration, based on my personal knowledge, pursuant to this Court’s August 23, 2007 Discovery Order, Docket No. 178, at p. 3.

2. I have now produced all documents that I have in my possession, custody, or control that are responsive to the defendant’s Interrogatories and Document Production Requests and required by this Court’s August 23, 2007 Discovery Order. I have done a thorough search of all places where such documents might be located and have produced all such documents.

3. I may have had some additional records in my possession prior to March 30, 2004, which was the date I was served with defendant’s discovery responses, that would have been responsive to those later discovery requests. In particular, I may have had some additional records that would have reflected my receipt of grant money via Western Union to pursue my media and public education work, because I remember that when I went to the Western Union

office to receive those transfers, I was sometimes asked to sign some kind of receipt. I did not keep such receipts prior to March 30, 2004 because I have been living on the road for the last six and a half years and have a very limited ability to keep track of papers, and because I did not know that such records had anything to do with the plaintiffs' claims in this case or defendant's defenses.

4. Although with few exceptions I do not regard any such information to be responsive to either Document Request No. 20 or Document Request No. 21, I have produced as many receipts as I could find that show how I spend the grant money I receive.

5. I believe that I have produced all responsive records that came into my possession since March 30, 2004, and I am absolutely confident that I did not intentionally destroy, discard, or otherwise dispose of any such documents. If I failed to produce every such document, this would only be because of the way I live – out of a used van; I do not have a home or office. I have tried my best to keep track of all documents I have received that in any way relate to this case, and to produce all responsive documents to defendant.

Pursuant to 26 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Tom E. Rider

9/24/2007
Date