UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JERRY GREENBERG, individually,
and IDAZ GREENBERG, individually,

Plaintiffs,

v.

NATIONAL GEOGRAPHIC SOCIETY, a district of Columbia corporation, NATIONAL GEOGRAPHIC ENTERPRISES, INC, a corporation, and MINDSCAPE, INC., a California corporation,

Defendants.

CASE NO. 97-3924
CIV-LENARD
Magistrate Judge Turnoff

DEFENDANTS' FIRST SET OF INTERROGATORIES

INTERROGATORIES

1. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Fed. R. Civ. P. 7(a)) filed in this action, or any fact underlying the subject matter of this action.

2. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to Interrogatory No. 1 may have.

3. Please identify all images which have been published in National Geographic Magazine as to which the plaintiffs claim to have an interest, and provide the number of the copyright registration for each such image.

4. Please state each item of damages that you claim, whether as an affirmative claim or as a setoff, and include in your answer: the count or defense to which the item of damages relates; the category into which each item of damages falls, *i.e.* general damages, special or consequential damages (such as lost profits), interest, and any other relevant categories; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

5. Please identify each document pertaining to each item of damages stated in your response to Interrogatory No. 6 above.

6. Please identify each document (including pertinent insurance agreements) pertaining to any fact alleged in any pleading (as defined in Fed. R. Civ. P. 7(a)) filed in this action.