UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division
CASE NO. 97-3924-CIV-SIMONTON

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.

DEFENDANTS' EXHIBIT LIST

Defendants National Geographic Society, National Geographic Enterprises, Inc.,[1] and Mindscape, Inc.,[2] by their attorneys, Weil, Gotshal & Manges LLP, respectfully submit the list of exhibits, annexed hereto as Exhibit A, which Defendants may introduce at the trial in this action. Defendants reserve the right to introduce any exhibit identified on Plaintiffs' exhibit list and to amend this exhibit list as necessary depending on the Court's ruling on any pretrial motion.

[1] National Geographic Enterprises is incorporated under the name National Geographic Holdings, Inc.

[2] Mindscape, Inc. has been dissolved and no longer exists. Its interests are being represented in this lawsuit by its former parent company, GTG/Wizard LLC.

Dated: New York, New York
December 11, 2002

ROBERT G. SUGARMAN, ESQ.
robert.sugarman@weil.com
NAOMI JANE GRAY, ESQ.
naomi.gray@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153-0119
Telephone: (212) 310-8000

- and -

EDWARD SOTO, ESQ. (265144)
edward.soto@weil.com
ERIC ASSOULINE, ESQ.
eric.assouline@weil.com
WEIL, GOTSHAL & MANGES LLP
701 Brickell Avenue
Suite 2100
Miami, Florida 33131
Telephone: (305) 577-3100
Facsimile: (305) 374-7159

Attorneys for Defendants

- and -

Terrence B. Adamson, Esq.
tadamson@ngs.org

Executive Vice President
National Geographic Society
1145 17th Street, N.W.
Washington, D.C. 20036-4688
Of Counsel

EXHIBIT A

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
		/	Letter	
		/	Publication	The Complete National Geographic
		/	Publication	Photograph of all issues of National Geographic Magazine
		/	Publication	Issues of National Geographic Magazine published in microfilm format
		/	Publication	Issues of National Geographic Magazine published in microfiche format
		/	Publication	Photocopies of National Geographic Magazine
		/	Website	National Geographic Society website
	Undated	JG/D /0001-5096	Invoice	Seahawk Products invoices
	6/24/1960	/	Letter	
	6/27/1960	/	Letter	
	7/5/1960	/	Letter	
	7/29/1960	/	Letter	Letter, handwritten note and check requisition
	8/2/1960	/	Memorandum	
	11/9/1960	/	Invoice	
	11/23/1960	/	Letter	
	3/31/1961	/	Memorandum	Memorandum and handwritten note
	4/5/1961	/	Invoice	
	4/11/1961	/	Letter	
	9/19/1961	/	Letter	
	1/1/1962	/	Publication	National Geographic Magazine
	6/20/1963	/	Letter	
	9/22/1965	/	Invoice	

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
	9/23/1965	/	Letter	
	10/21/1965	/	Letter	
	3/2/1966	/	Letter	
	3/13/1967	/	Letter	
	3/13/1967	/	Letter	
	3/23/1967	/	Letter	
	4/21/1967	/	Report	
	5/24/1967	/	Letter	
	2/1/1968	/	Publication	National Geographic Magazine
	7/28/1969	/	Letter	
	8/8/1969	/	Letter	
	9/24/1969	/	Letter	
	12/1/1969	/	Check Requisition	
	3/10/1970	/	Letter	
	3/10/1970	/	Letter	
	4/10/1970	/	Letter	
	5/6/1970	/	Invoice	
	5/6/1970	/	Invoice	
	8/20/1970	/	Invoice	
	8/20/1970	/	Invoice	
	8/20/1970	/	Invoice	
	8/20/1970	/	Invoice	
	8/24/1970	/	Invoice	

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
	8/24/1970	/	Invoice	
	2/3/1971	/	Memorandum	
	2/3/1971	/	Memorandum	Memorandum and handwritten note
	2/12/1971	/	Letter	
	2/12/1971	/	Letter	
	5/1/1971	/	Publication	National Geographic Magazine
	9/18/1973	/	Check Requisition	
	10/2/1973	/	Letter	
	10/6/1975	/	Check Requisition	
	1/1/1976	JG/D /7122-7122	Publication	The Coral Reef
	11/25/1980	JG/D /5036	Letter	
	1/1/1981	JG/D /7117-7117	Publication	Sharks and Other Dangerous Creatures
	1/1/1983	JG/D /7149-7149	Publication	The Radiant Reef
	1/1/1983	JG/D /7151-7151	Publication	1984 Seascapes Calendar
	1/1/1984	JG/D /7150-7150	Publication	1985 Seascapes Calendar
	11/15/1985	NGS 059/0005-5	Letter	
	12/18/1985	/	Letter	
	1/1/1986	JG/D /7148-7148	Letter	Beneath Tropic Seas
	1/1/1987	JG/D /7118-7118	Publication	The Fishes Beneath the Tropic Seas
	6/8/1988	JG/D /5040	Letter	
	2/23/1989	JG/D /5044	Letter	
	6/14/1989	/	Letter	
	7/3/1989	NGS 059/0001-1	Letter	

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
	8/3/1989	/	Letter	
	8/9/1989	NGS 059/0002-2	Letter	
	5/9/1990	JG/D /3026-3027	Letter	
	6/22/1990	JG/D /3017	Letter	
	7/1/1990	/	Publication	National Geographic Magazine
	8/19/1993	JG/D /3043-3049	Invoice	Purchase order, invoice and correspondence
	3/11/1994	/	Invoice	
	1/1/1995	JG/D /7080-7091	Journal Entries	
	10/26/1995	/	Letter	
	1/1/1996	JG/D /7068-7079	Journal Entries	
	1/31/1996	NGS 021/0071-108	Report	
	2/3/1996	NGS 005/0379-382	Letter	
	8/26/1996	JG/D /7092-7092	Letter	
	9/17/1996	JG/D /7093-7093	Letter	
	9/24/1996	JG/D /7094-7094	Letter	
	1/1/1997	JG/D /7056-7067	Journal Entries	
	2/21/1997	NGS 026/0028-29	Letter	
	3/4/1997	NGS 016/0525-527	Letter	
	3/11/1997	NGS 016/0021-22	Memorandum	
	3/20/1997	NGS 025/0023-24	Minutes	Meeting of Board of Directors of NGE, Inc.
	3/20/1997	NGS 025/0027-29	Minutes	Meeting of Board of Directors of NGV, Inc.
	4/2/1997	JG/D /3029	Letter	
	4/15/1997	NGS 037/0126-189	Tax Records	Form 990

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
	4/18/1997	NGS 016/1407-1407	Memorandum	
	4/24/1997	NGS 026/0021-22	Letter	
	4/24/1997	NGS 061/0001-3	Letter	
	5/6/1997	NGS 005/0362-365	Letter	
	5/6/1997	NGS 005/0610-611	Memorandum	
	5/8/1997	NGS 061/0001-2	Memorandum	
	5/21/1997	NGS 016/0513-514	Letter	
	6/6/1997	NGS 025/0025-26	Minutes	Meeting of Board of Directors of NGE, Inc.
	6/6/1997	NGS 025/0030-31	Minutes	Meeting of Board of Directors of NGV, Inc.
	6/12/1997	NGS 025/0001-11	Minutes	Meeting of Board of Trustees of National Geographic Society
	6/19/1997	NGS 027/0019-22	Letter	
	6/19/1997	NGS 016/1397-1397	Memorandum	
	6/19/1997	NGS 026/0001-46	Letter	
	6/26/1997	NGS 016/0503-504	Memorandum	
	6/26/1997	NGS 016/0593-595	Letter	
	6/26/1997	NGS 024/0105-106	Letter	
	7/21/1997	NGS 016/0570-574	Letter	
	7/23/1997	NGS 016/0483-502	Letter	
	8/13/1997	NGS 024/0029-86	Memorandum	
	8/14/1997	NGS 018/0120-123	Report	
	9/11/1997	NGS 025/0032-42	Minutes	Meeting of Board of Trustees of National Geographic Society
	10/29/1997	/	Memorandum	
	1/1/1998	JG/D /7044-7055	Journal Entries	

Defendants' Exhibit List

Exhibit No.	Date	Bates Range	DocType	Notes
	4/15/1998	NGS 037/0075-125	Tax Records	Form 990
	4/30/1998	JG/D /3028	Letter	
	1/1/1999	JG/D /7032-7043	Journal Entries	
	4/15/1999	NGS 037/0001-74	Tax Records	Form 990
	9/27/1999	NGS 027/0001-3	Report	
	10/14/1999	NGS 025/0012-22	Minutes	Meeting of Board of Trustees of National Geographic Society
	10/14/1999	/	Minutes	Meeting of Board of Trustees of National Geographic Society
	1/1/2000	JG/D /7021-7031	Journal Entries	
	1/1/2000	JG/D /7119-7119	Publication	Mangroves, Trees in the Sea
	4/15/2000	/	Tax Records	Form 990
	1/1/2001	JG/D /7009-7020	Journal Entries	
	4/15/2001	/	Tax Records	Form 990
	5/1/2001	JG/D /5087	Invoice	Seahawk Press invoices
	5/2/2001	/	Letter	
	7/12/2001	/	Minutes	Meeting of Board of Trustees of National Geographic Society
	7/27/2001	JG/D /5087	Invoice	Seahawk Press invoices
	1/1/2002	JG/D /7000-7008	Journal Entries	
	9/20/2002	/	Report	Expert report
	9/20/2002	/	Report	Expert report
	12/11/2002	/	Letter	