

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 97-3924-CIV-LENARD-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' Second Request For Production of Documents**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants National Geographic Society, National Geographic Enterprises, Inc. and Mindscape, Inc., by their attorneys, Weil, Gotshal & Manges LLP, hereby request that Plaintiffs Jerry Greenberg and Idaz Greenberg produce each of the following documents in their possession, custody or control.

**DEFINITIONS AND INSTRUCTIONS**

1. The "Amended Complaint" shall mean the Plaintiffs' Amended Complaint dated December 23, 1997.
2. The term "concerning" shall mean relating to, referring to, describing, evidencing or constituting.
3. "The Complete National Geographic" shall mean the collection, in CD-ROM or DVD format, of all issues of National Geographic Magazine (the "Magazine").
4. "Document" shall have the same meaning as the term "document" in Rule 34(a) of the Federal Rules of Civil Procedure, and shall include all such items which would be

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**Andrew J. Sherman**



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## **Table of Contents Sample Response To Request For Production Of Documents**

1. Understanding the eBook Sample Response To Request For Production Of Documents
  - The Rise of Digital Reading Sample Response To Request For Production Of Documents
  - Advantages of eBooks Over Traditional Books
2. Identifying Sample Response To Request For Production Of Documents
  - Exploring Different Genres
  - Considering Fiction vs. Non-Fiction
  - Determining Your Reading Goals
3. Choosing the Right eBook Platform
  - Popular eBook Platforms
  - Features to Look for in an Sample Response To Request For Production Of Documents
  - User-Friendly Interface
4. Exploring eBook Recommendations from Sample Response To Request For Production Of Documents
  - Personalized Recommendations
  - Sample Response To Request For Production Of Documents User Reviews and Ratings
  - Sample Response To Request For Production Of Documents and Bestseller Lists
5. Accessing Sample Response To Request For Production Of Documents Free and Paid eBooks
  - Sample Response To Request For Production Of Documents Public Domain eBooks
  - Sample Response To Request For Production Of Documents eBook Subscription Services
  - Sample Response To Request For Production Of Documents Budget-Friendly Options
6. Navigating Sample Response To Request For Production Of Documents eBook Formats
  - ePub, PDF, MOBI, and More
  - Sample Response To Request For Production Of Documents Compatibility with Devices
  - Sample Response To Request For Production Of Documents Enhanced eBook Features
7. Enhancing Your Reading Experience

- Adjustable Fonts and Text Sizes of Sample Response To Request For Production Of Documents
  - Highlighting and Note-Taking Sample Response To Request For Production Of Documents
  - Interactive Elements Sample Response To Request For Production Of Documents
8. Staying Engaged with Sample Response To Request For Production Of Documents
    - Joining Online Reading Communities
    - Participating in Virtual Book Clubs
    - Following Authors and Publishers Sample Response To Request For Production Of Documents
  9. Balancing eBooks and Physical Books Sample Response To Request For Production Of Documents
    - Benefits of a Digital Library
    - Creating a Diverse Reading Collection Sample Response To Request For Production Of Documents
  10. Overcoming Reading Challenges
    - Dealing with Digital Eye Strain
    - Minimizing Distractions
    - Managing Screen Time
  11. Cultivating a Reading Routine Sample Response To Request For Production Of Documents
    - Setting Reading Goals Sample Response To Request For Production Of Documents
    - Carving Out Dedicated Reading Time
  12. Sourcing Reliable Information of Sample Response To Request For Production Of Documents
    - Fact-Checking eBook Content of Sample Response To Request For Production Of Documents
    - Distinguishing Credible Sources
  13. Promoting Lifelong Learning
    - Utilizing eBooks for Skill Development
    - Exploring Educational eBooks
  14. Embracing eBook Trends
    - Integration of Multimedia Elements
    - Interactive and Gamified eBooks

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