

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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Jerome Borison



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