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' WITNESS LIST

Defendants National Geographic Society, National Geographic Enterprises, Inc.,¹ and Mindscape, Inc.,² by their attorneys, Weil, Gotshal & Manges LLP, respectfully submit this list of witnesses whom Defendants may call at the trial in this action. Defendants reserve the right to call any witness identified on Plaintiffs' witness list and to amend this witness list as necessary depending on the Court's ruling on any pretrial motion.

Joan Abrahamson

Terrence B. Adamson

Joe Allbritton

William Allen

Thomas E. Bolger

Lewis Branscomb

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.

Martha E. Church

Terrie Clifford

Michael Collins

Suzanne Dupré

John Fahey

Andrew Freedman

James H. Gilliam, Jr.

Jerry Greenberg

John Griffin

Angelo M. Grima

Gilbert Grosvenor

Nina Hoffman

John Jay Iselin

James C. Kautz

Paul Kilmer

Jane Kinne

Kent J. Kobersteen

Paul Kramer

Robert Madden

J. Willard Marriott, Jr.

David McEvoy

Floretta D. McKenzie

Patrick F. Noonan

Dennis R. Patrick

Mark Radcliffe

Hon. William K. Reilly

Hon. Rozanne Ridgway

José Rodriguez

Ian Rose

John Rutter

Scott Santulli

B. Francis Saul II

Robert Sims

Thomas Stanton

Eric Stone

Robert G. Sugarman

Dated:

New York, New York

December 11, 2002

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