UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Miami Division

CASE NO. 97-3924-CIV-SIMONTON

JERRY GREENBERG, individually,

Plaintiff,

VS.

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

Defendants.

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT

Plaintiff, JERRY GREENBERG, moves pursuant to Rule 58, Federal Rules of Civil Procedure, for entry on a separate document of judgment in his favor.

The judgment should award damages to the Plaintiff pursuant to the Jury Verdict entered on March 6, 2003 (D.E. #275), as confirmed and modified in the Court's Order on Motion For A New Trial, entered on September 30, 2005, and Order On Motions For Judgment As A Matter Of Law, Motion For Reduction In Jury Award, Or In The Alternative For Remittitur, entered on the same date.

The Plaintiff urges that the Court retain jurisdiction to consider a motion for attorneys' fees and costs, and to consider a motion for prejudgment interest.

Respectfully submitted,

SQUIRE, SANDERS & DEMPSEY L.L.P. Attorneys for Plaintiff

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<u>Certificate of Service</u>

I hereby certify that a copy of the foregoing motion was served by mail on Edward Soto, Esq., Weil, Gotshal & Manges LLP, 701 Brickell Avenue, Suite 2100, Miami, FL 33131; by electronic means on Stephen N. Zack, Esq., Boies, Schiller & Flexner LLP, 2800 Bank of America Tower, 100 Southeast Second Street, Miami, FL 33131; and by mail on Robert G. Sugarman, Esq., Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York NY 10153 this 17th day of October 2005.