STEEL HECTOR & DAVIS

Steel Hector & Davis LLP
200 South Biscayne Boulevard
Miami, Florida 33131-2398
305.577.7000
305.577.7001 Fax

JERRY'S ORIGINALS

PAID

February 26, 1998

Norman Davis
305.577.2988

Jerry and Idaz Greenberg
6840 S.W. 92nd Street
Miami, Florida 33156

Re: Seahawk Press - National Geographic - 80984.5801 - $24,048.99

Dear Jerry and Idaz:

I am forwarding invoice number 184438, which covers services rendered in the National Geographic matter from October 17, 1997 through January 31, 1998, plus costs expended during that period. I'm not certain why invoices were not rendered more frequently, but it will greatly assist me if you are able to remit the invoiced amount at your earliest convenience. If you have any questions, of course, let me know.

Sincerely,

Norman Davis

Enclosure

TOTAL $24,048.99

PAID

$12,000.00 CK#1800

$6,000.00 CK#1807

PAID

$3,000.00 CK#1823

$3,048.99 CK#1825

TOTAL SHD HRS

251.86
- 176.50 CD-ROM
75.36 X
$235.00 =
$17,709.60

Key West
305.292.7272
305.292.7271 Fax

Caracas
582.951.4105
582.951.4106 Fax

IN ACCOUNT WITH
STEEL HECTOR & DAVIS LLP
200 South Biscayne Boulevard
MIAMI, FLORIDA 33131-2398

Fed. Tax Id. No. 590702089

Seahawk Press
6840 SW 92 Street
Miami, FL 33156

February 19, 1998
Invoice 184438

Our File #80984.5801
National Geographic

For Services Through 01/31/98

Date	Description	
10/17/97	Research recent copyright case dealing with the transformation of copyrighted work to the CD Rom medium; read, highlight and shepardize said case in preparation for discussion about same with N. Davis. DAVID A. ARONBERG	1.50
11/03/97	Research Nimmer on Copyright on the scope of copyright protection for collective works, photographs, revised works and works published in different media; review the Tasini case. DAVID A. ARONBERG	1.40
11/04/97	Review Tasini decision; research Nimmer treatise on collective works, compilations and derivative works; research same on-line; begin reading, highlighting and shepardizing said research; analyze case with N. Davis. DAVID A. ARONBERG	4.00
11/05/97	Research Nimmer on Copyright on the difference between a compilation, a collective work and a derivative work; review the Tasini decision; review the differences between the National Geographic's CD-Rom and the CD-Rom of other compilations; analyze case with N. Davis; write memo to N. Davis re: insights into the Tasini decision. DAVID A. ARONBERG	1.50
11/06/97	Write memo to N. Davis re: the copyright practices of on-line publishers, and the differences between the on-line publisher in Tasini and the NGS. DAVID A. ARONBERG	.30
11/07/97	Analyze case with N. Davis. DAVID A. ARONBERG	1.20
11/10/97	Analyze case and discuss complaint with N. Davis. DAVID A. ARONBERG	.40

Date	Description	
11/14/97	Research articles on the Tasini case and the outlook for future challenges to electronic infringement on copyrights. DAVID A. ARONBERG	.60
11/17/97	Research and highlight recent articles on Tasini and other developments in the field of copyright law involving electronic publishing and collective works; send new research to N. Davis for review. DAVID A. ARONBERG	.70
11/18/97	Discuss New York complaint filed against the National Geographic Society with N. Davis; analyze with N. Davis our causes of action in contrast with New York complaint. DAVID A. ARONBERG	.30
11/24/97	Review draft complaint to be filed by New York plaintiff against National Geographic; analyze our complaint against the National Geographic with N. Davis. DAVID A. ARONBERG	1.20
11/26/97	Review and analyze the complaint with N. Davis. DAVID A. ARONBERG	.30
11/29/97	Review and analyze N. Davis' draft of a complaint to be filed against the National Geographic in federal court. DAVID A. ARONBERG	1.00
12/01/97	Revisions to complaint. Telephone conferences with J. Greenberg and I. Greenberg regarding litigation strategy. NORMAN DAVIS	1.20
12/02/97	Conferences with D. Aronberg regarding complaint. Revisions to complaint. NORMAN DAVIS	3.00
12/02/97	Legal research for Norman Davis. MONICA WILSON, PARALEGAL	.20
12/03/97	Revision of complaint. NORMAN DAVIS	3.00
12/04/97	Revision of complaint. NORMAN DAVIS	1.20
12/05/97	Review and analyze revised complaint; conduct and analyze research on pleading requirements in federal court; research the elements of copyright protection; analyze all issues with N. Davis before filing complaint. DAVID A. ARONBERG	3.00
12/05/97	Completion of complaint. Meeting with J. Greenberg and I. Greenberg. Conference with D. Aronberg regarding complaint. NORMAN DAVIS	3.40

Date	Description	
12/09/97	Review and analyze final version of complaint served today with N. Davis. DAVID A. ARONBERG	.30
12/15/97	Telephone conference with Bob Sugarman regarding complaint and response. Telephone conference with J. Greenberg and I. Greenberg. NORMAN DAVIS	.80
12/15/97	Discuss and analyze, with N. Davis his conversation with New York counsel for National Geographic; analyze our next steps after receiving response from opposing counsel. DAVID A. ARONBERG	.20
12/17/97	Analyze research issues with N. Davis; research Martindale-Hubbel directory to attempt to reach counsel for Tasini. DAVID A. ARONBERG	1.50
12/17/97	Conferences with D. Aronberg regarding forthcoming legal research and discussion of legal strategy. Telephone conference with Fred Ward regarding regional editions. NORMAN DAVIS	2.00
12/19/97	Review and analyze correspondence between client and National Geographic with N. Davis; conduct and analyze research the construction of assignments and licenses in copyright law; discuss same with N. Davis; discuss Tasini briefs with Tasini New York counsel and request documents from counsel; research contracts law as to whether client's letter to National Geographic would limit the National Geographic's granting of rights to client in reply to client's letter. DAVID A. ARONBERG	2.80
12/19/97	Review of assignments and contracts. Meeting with J. Greenberg and I. Greenberg. NORMAN DAVIS	2.00
12/21/97	Review and analyze documents provided by client in order to amend the complaint against the National Geographic; discuss same with N. Davis. DAVID A. ARONBERG	2.00
12/21/97	Preparation of amended complaint. NORMAN DAVIS	3.00
12/22/97	Preparation of amended complaint. NORMAN DAVIS	2.00
12/22/97	Discuss, analyze and revise amended complaint with N. Davis. DAVID A. ARONBERG	1.00
12/29/97	Review Tasini pleadings sent to us by counsel for Tasini plaintiffs. DAVID A. ARONBERG	.40
01/07/98	Analyze status of case, collective work research and Tasini briefs with N. Davis. DAVID A. ARONBERG	1.10

Date	Description	
01/07/98	Review of memoranda filed in Tasini case. Conference with D. Aronberg. Telephone conference with J. Greenberg.	
	NORMAN DAVIS	2.00
01/08/98	Research case law from all jurisdictions on collective works and the House Report that discusses collective works.	
	DAVID A. ARONBERG	.80
01/09/98	Telephone conference with J. G. regarding discovery issues and case status.	
	NORMAN DAVIS	.50
01/09/98	Conduct and analyze research into collective works and the House Report that discusses collective works.	
	DAVID A. ARONBERG	2.50
01/12/98	Conduct and analyze on collective works and the House Report that discusses collective works.	
	DAVID A. ARONBERG	1.00
01/12/98	Telephone conference with J. Greenberg and I. Greenberg regarding court order mandating meeting of parties.	
	NORMAN DAVIS	.50
01/14/98	Discuss status of case with N. Davis; review and analyze research into the issue of research into collective works and the House Report that discusses what comprises a collective work.	
	DAVID A. ARONBERG	.90
01/15/98	Discuss and analyze case with N. Davis; review research on what constitutes a "new" work in the context of obtaining statutory damages; discuss same with N. Davis.	
	DAVID A. ARONBERG	1.00
01/15/98	Telephone conferences with Bob Sugarman regarding settlement and scheduling Telephone conferences with J. Greenberg and I. Greenberg regarding settlement issues.	
	NORMAN DAVIS	2.30
01/16/98	Telephone conferences with Robert Sugarman regarding enlargement and regarding settlement. Conferences with D. Aronberg regarding strategy. Numerous telephone conferences with J. Greenberg and I. Greenberg regarding settlement. Preparation of settlement proposal.	
	NORMAN DAVIS	4.00
01/16/98	Analyze case with N. Davis; conference call with N. Davis and clients; conduct and analyze research into Rule 56(f) of the Federal Rules of Civil Procedure; conduct and analyze research into the effect of partial summary judgment on remaining counts.	
	DAVID A. ARONBERG	3.60

Date	Description	
01/17/98	Review and analyze research into what constitutes a "new" collective work; Analyze recently published Tasini opinion on plaintiff's motion for reconsideration. DAVID A. ARONBERG	1.50
01/18/98	Analyze case with N. Davis; review Rule 56(f) of the Federal Rules of Civil Procedure. DAVID A. ARONBERG	1.00
01/19/98	Meeting with J. Greenberg and I. Greenberg regarding documents and witnesses to be disclosed at scheduling meeting. NORMAN DAVIS	2.50
01/19/98	Analyze case with N. Davis, including our chances of prevailing in a Rule 56(f) argument; meeting with client and N. Davis. DAVID A. ARONBERG	3.40
01/20/98	Review opposing counsel's request for an extension of time; discuss and analyze our proper response to opposing counsel's request for an extension of time with the court; compare Tasini facts with those of our case with N. Davis. DAVID A. ARONBERG	2.10
01/20/98	Several telephone conferences with opposing counsel regarding scheduling motion. Several telephone conferences with J. Greenberg and I. Greenberg. Conferences with D. Aronberg regarding strategy as to proposed motion. NORMAN DAVIS	3.70
01/22/98	Analyze case with N. Davis, and in particular our response to opposing counsel's motion for an extension of time; research the issue of whether a motion for partial summary judgment tolls the time to respond to the remaining counts; obtain pleadings in the recently filed Faulkner case. DAVID A. ARONBERG	2.40
01/22/98	Preparations of response to defendant's motion for scheduling order. NORMAN DAVIS	2.00
01/23/98	Review and analyze our response to opposing counsel's motion for extension of time; discuss same with N. Davis and make revisions to said response; review House Report on Section 201(c) of the Copyright Act. DAVID A. ARONBERG	1.90
01/23/98	Legal research for David Aronberg. MONICA WILSON, PARALEGAL	.20
01/23/98	Conferences with J. Greenberg, I. Greenberg and D. Aronberg regarding response to motion for scheduling order. Preparation of response. NORMAN DAVIS	1.80
01/26/98	Analyze case with N. Davis; conference call with client. DAVID A. ARONBERG	1.20

Date	Description	
01/26/98	Telephone conferences with Bob Sugarman and Naomi Gray regarding filing and response dates. Conference with D. Aronberg regarding response to forthcoming summary judgment motion. Telephone conference with J. Greenberg and I. Greenberg regarding comparable NGS products. NORMAN DAVIS	1.50
01/27/98	Telephone conferences with J. Greenberg regarding discovery materials. NORMAN DAVIS	.60
01/27/98	Analyze case with N. Davis. DAVID A. ARONBERG	.50
01/28/98	Review, analyze and shepardize case law on what constitutes a "new" collective work. DAVID A. ARONBERG	.40
01/29/98	Analyze case with N. Davis. DAVID A. ARONBERG	.50
01/30/98	Initial reading of defendants' motion for summary judgment. NORMAN DAVIS	1.00
01/30/98	Analyze Rule 56(f) issues with N. Davis; research case law on a federal court's power to convert a motion to dismiss into a motion for a summary judgment. DAVID A. ARONBERG	2.40
01/31/98	Preparation of responses to defendants' motions. NORMAN DAVIS	8.00
01/31/98	Review motion to dismiss; conduct and analyze research on converting a motion to dismiss to a motion for summary judgment; conduct and analyze research on Rule 56(f) of the Federal Rules of Civil Procedure; conduct and analyze research on a federal court's discretion to require discovery before granting summary; discuss all issues with N. Davis. DAVID A. ARONBERG	6.20
	Fees for legal services	**$21,355.60**

DISBURSEMENT SUMMARY

Disbursements	Total
Photocopy Charges	226.50
Telephone Charges	32.07
Telecopy Charges	303.00
Employee Overtime	56.25
Computer Research - Lexis	52.12
Computer Research - Westlaw	786.65
Federal Express, Delivery	47.45
Lightning Courier, Delivery	27.75
Filing Fees	150.00
Computer Utilization Support Charges	1,011.60
Total	**$ 2,693.39**

Total Amount of Fees and Costs this Invoice **$ 24,048.99**

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