

Protecting the Little Guy: *Greenberg v. National Geographic Society*, 533 F.3d 1244 (11th Cir. 2008), and § 201(c) of the Copyright Act.

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I. INTRODUCTION

The Copyright Act received an overhaul in 1976. One of the changes was that artists received increased rights to their specific contributions to collective works.¹ Before 1976, contributing artists only had a recognized copyright in their works when the publication of those works included a copyright notice in the author's name.² The 1976 Act, however, provided that freelance artists could assign the six

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¹ See *N.Y. Times Co. v. Tasini*, 533 U.S. 483, 494 (2001) (explaining changes after 1976 revision); *Greenberg v. Nat'l Geographic Soc'y*, 533 F.3d 1244, 1248 (11th Cir. 2008), *cert. denied* 129 S. Ct. 727 (2008) (discussing history of Copyright Act changes). *Accord* H.R. REP. NO. 94-1476, *reprinted in* 1976 U.S.C.C.A.N. 5659, 5738 (showing that Congress intended to remedy an unfair situation to artists contributing to collective works).

² See *Tasini*, 533 U.S. at 494 (explaining rights under prior copyright law); *Greenberg*, 533 F.3d at 1248 (noting rights under prior copyright law). *Accord* Alice Haemmerli, *Commentary: Tasini v. New York Times Co.*, 22 COLUM.VLA J.L. & ARTS 129, 132 (1998) (finding that prior to 1976, authors lost their copyright to their contribution "by operation of law" if they assigned their entire copyright to the