

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

NIGHT BOX
FILED

2004

FRANCIS MADDOX
CLERK U.S. DISTRICT COURT / SDFL / FTL

STELOR PRODUCTIONS, INC.

CASE NO. 04-80954-HURLEY/HOPKINS

Plaintiff/Counter-Defendant,

STEVEN A. SILVERS,

Defendant/Counter-Plaintiff.

_____ /

AGREED MOTION FOR ENLARGEMENT OF TIME

Steven A. Silvers, Defendant and Counter-Plaintiff (the "Defendant"), files this AGREED MOTION FOR ENLARGEMENT OF TIME, and respectfully requests a brief fourteen (14) day enlargement of time such that (a) the discovery cut-off deadline would be extended through and including December 17, 2004; and (b) the Defendant would have through and including December 24, 2004 to respond to Plaintiff/Counter-Defendant Stelor Productions, Inc.'s (the "Plaintiff") "EMERGENCY" MOTION FOR PRELIMINARY INJUNCTION (the MOTION'). In support thereof, Defendant states as follows:

1. On October 25, 2004, the Plaintiff served the MOTION.
2. On November 2, 2004, the Defendant filed his MOTION TO EXTEND TIME TO RESPOND TO "EMERGENCY" MOTION FOR PRELIMINARY INJUNCTION AND TO INITIATE DISCOVERY.
3. On November 5, 2004, the District Court entered an ORDER DENYING PLAINTIFF'S REQUEST FOR EMERGENCY RELIEF & REFERRING MOTION FOR PRELIMINARY INJUNCTION TO MAGISTRATE JUDGE JAMES HOPKINS FOR REPORT AND RECOMMENDATION, granting Defendant's motion for an enlargement of time such that a response is due to the Plaintiff's MOTION on December

10, 2004 and allowing the parties to pursue discovery “up through December 3, 2004.”

5. The parties have been engaging in substantial efforts to settle and narrow the issues in this matter, which to date have been successful. In fact, the depositions that were scheduled for this week were postponed so the parties could engage in settlement discussions for two full days.

6. The parties agree to and jointly request this enlargement of time.

7. Accordingly, the parties have agreed to a fourteen (14) day enlargement of time pursuant to which the discovery cut-off deadline would be extended through and including December 17, 2004, and the Defendant would be allowed through and including December 24, 2004 to respond to the MOTION.

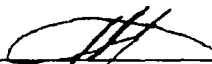
8. No party would be prejudiced by this Court’s grant of the requested extension of time, nor is it made for purposes of delay. Further, additional time will serve the parties in exploring a settlement of this matter, which would assist in efforts of judicial economy.

Accordingly, Defendant respectfully requests that this Court enter an Order granting an enlargement of time to engage in discovery through and including December 17, 2004 and to the Defendant through and including December 24, 2004 to serve a response to the MOTION.

Respectfully submitted,

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By: 
Adam T. Rabin
Florida Bar No. 985635
Lorenz Michel Prüss
Florida Bar No.: 581305

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing document titled:
AGREED MOTION FOR ENLARGEMENT OF TIME has been furnished by U.S. Mail this 2 day of
December, 2004 to: Stanley A. Beiley, Esq., Sacher, Zelman, Van Sant, Paul, Beiley, Hartman,
Rolnick & Waldman, P.A., 1401 Brickell Avenue, Suite 700, Miami, Florida 33131; and Laurence
R. Hefter, Esq., Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P., 1300 I Street, N.W.,
Washington, D.C. 20005-3315.

By: 
Lorenz Michel Prüss