Doc. 111

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CLARENCE MADDOX CLERK U.S. DIST. CT. S.D. OF FLA. . MIAMI

CASE NO. 05-80387 CIV RYSKAMP/VITUNIC

STEVEN A. SILVERS, an individual,

Plaintiff,

v.

GOOGLE INC., a Delaware corporation,

Defendant.

GOOGLE INC., a Delaware corporation

Counterclaimant,

v.

STEVEN A. SILVERS, an individual; STELOR PRODUCTIONS, INC., a Delaware Corporation; STELOR PRODUCTIONS, LLC, a Delaware limited liability company,

Counterdefendants.

ROBERT MORSE PRIVILEGE LOG

DATE	BATES	DESCRIPTION	PRIVILEGE(S) ASSERTED
1/26/04	(n/a)	Email from Silvers to Esrig re: potential litigation	Attorney Client/Work Product/ Joint Defense and Prosecution Privilege
1/24/04	(n/a)	Memo to Steve Esrig & Members of the Board of Directors regarding litigation strategies	Attorney Client/Work Product

1/26/04	(n/a)	Email from Silvers to Steve Esrig re: potential litigation	Attorney Client/Work Product/Joint Defense and Prosecution Privilege
1/26/04	(n/a)	Email from Silvers to Esrig re: potential litigation	Attorney Client/Work Product/Joint Defense and Prosecution Privilege
1/28/04	(n/a)	Email from Steve Esrig to Board Member regarding litigation strategies	Attorney Client/Work Product
6/10/02	(n/a)	Email from Stelor to Robert Morse (RM) regarding dispute with Creative Network Innovations (CNI) with RM handwritten notes	Attorney Client/Work Product
6/18/02	(n/a)	Email from RM to Steve Esrig regarding CNI	Attorney Client/Work Product
6/20/02	(n/a)	Email from Stelor to RM regarding CNI	Attorney Client/Work Product
6/20/02	(n/a)	Email from Stelor regarding CNI	Attorney Client/Work Product
5/28/02	(n/a)	Email from Steven Silvers to Steve Esrig regarding potential litigation	Attorney Client/Work Product/Joint Defense and Prosecution Privilege
6/20/02	(n/a)	Fax to RM regarding Google	Attorney Client/Work Product
5/9/02	(n/a)	Email from Steve Esrig to RM regarding Aurora Agreement	Attorney Client/Work Product
5/31/02	(n/a)	Email from Stelor to RM regarding contract details	Attorney Client/Work Product
6/2/02	(n/a)	Email from Steven Silvers regarding litigation issues	Attorney Client/Work Product; Joint Defense and Prosecution Privilege

5/29/02	(n/a)	Letter from Carey Fisher, Esq. to Stelor Production regarding Asset Purchase Agreement with RM annotations	Attorney Client/ Work Product
5/31/02	(n/a)	Opinion letter from Robert Morse re: Aurora Agreement	Attorney Client/Work Product
5/30/02	(n/a)	Email to RM re: Silvers	Attorney Client/Work Product
(n/a)	(n/a)	Handwritten note from Robert Morse	Attorney Client/Work Product
6/1/02	(n/a)	Draft Consultant Agreement between Stelor Production and Steven Silvers	Attorney Client/Work Product
5/1/02	Draft (n/a)	Draft Asset Purchase Agreement between The Aurora Collection and Stelor Productions with RM comments	Attorney Client/Work Product
(n/a)	(n/a)	Draft Amendment to License, Distribution and Manufacturing Agreement between S. Silvers and Aurora Collection with RM comments	Attorney Client/Work Product
11/5/02	(n/a)	Email from Ira Edell to Stelor regarding representation	Attorney Client/Work Product
11/4/02	(n/a)	Email from Ira Edell to Stelor regarding representation	Attorney Client/Work Product
(n/a)	(n/a)	Handwritten notes from RM re: overview of issues	Attorney Client/Work Product
5/10/02	(n/a)	Fax from John Neubauer to RM regarding Aurora Agreement	Attorney Client/Work Product
(n/a)	(n/a)	Draft of letter of intent of Stelor Productions and Steven Silvers	Attorney Client/Work Product
June 13	(n/a)	Fax from RM re: representations	Attorney Client/Work Product

(n/a)	(n/a)	Draft Confidentiality Agreement and Covenant Not to Compete	Attorney Client/Work Product
(n/a)	(n/a)	Draft Licensing Proposal	Attorney Client/Work Product
(n/a)	(n/a)	Data Analysis for Googles.com Handwritten notes from RM	Attorney Client/Work Product
		re: overview of issues	

Respectfully submitted,

BURLINGTON, SCHWIEP, KAPLAN & BLONSKY, P.A. Attorneys for Stelor Productions, LLC 2699 South Bayshore Drive, Penthouse Miami, Florida 33133 Tel: 305-858-2900 Fax: 305-858-5261 Email: <u>kkaplan@bwskb.com</u>

By: <u>/s/ Kevin C. Kaplan</u> Kevin C. Kaplan Florida Bar No. 933848 David J. Zack Florida Bar No. 641685

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was served via Electronic

Mail and U.S. mail on this 18th day of August, 2006 upon the following:

Kenneth R. Hartmann, Esq.	Ramsey M. Al-Salam, Esq.
krh@kttlaw.com	Washington Bar. No. 18822
Gail A. McQuilkin, Esq.	ralsalam@perkinscoie.com
gam@kttlaw.com	William C. Rava, Esq.
KOZYAK, TROPIN, THROCKMORTON,	Washington Bar No. 29948
P.A.	wrava@perkinscoie.com
2525 Ponce de Leon, 9th Floor	PERKINS COIE LLP
Miami, FL 33134	1201 Third Avenue
Telephone: (305) 372-1800	Suite 4800
Facsimile: (305) 372-3508	Seattle, WA 98101-3099
	Telephone: (206) 359-6338
	Facsimile: - (206) 359-7338

Adam T. Rabin, Esq.	
arabin@dkrpa.com	Johanna Calabria, Esq.
DIMOND, KAPLAN & ROTHSTEIN,	California Bar No. 226222
P.A.	jcalabria@perkinscoie.com
525 South Flagler Drive	PERKINS COIE LLP
Trump Plaza, Suite 200	180 Townsend Street, 3rd Floor
West Palm Beach, FL 33401	San Francisco, CA 94107
Telephone: (561) 671-1920	Telephone: (415) 344-7000
Facsimile: (561) 671-1951	Facsimile: (415) 344-7050
Jan Douglas Atlas, Esq.	
Florida Bar No. 226246	
jda@adorno.com	
Samantha Tesser Haimo, Esq.	
Florida Bar No. 0148016	
stesser@adorno.com	
ADORNO & YOSS LLP	
Suite 1700	
350 East Las Olas Boulevard	
Fort Lauderdale, FL 33301	
Telephone : (954) 763-1200	
Facsimile: (954) 766-7800	

<u>/s/ Kevin C. Kaplan</u> Kevin C. Kaplan