



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 05-80387 CIV RYSKAMP/VITUNAC

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, and
STEVEN ESRIG, an individual,

Counterdefendants.

PRIVILEGE LOG OF SILVERS DOCUMENTS

	DESCRIPTION	PRIVILEGE(S) ASSERTED
1	Email to S. Esrig from S. Silvers (cc: Soulfree63@aol.com) discussing joint strategy regarding intellectual property matter, 11/03/01	Work-Product/Common Interest Privilege
2	Email to S. Esrig from S. Silvers (cc: Soulfree63@aol.com) discussing joint strategy regarding intellectual property matter, 10/01/01	Work-Product/Common Interest Privilege
3	Email to S. Esrig from S. Silvers discussing consulting agreement and financial matters, 5/31/02	Work-Product/Common Interest Privilege
4	Portion of Email from S. Silvers discussing trademarks and litigation strategy, date in right hand corner is	Work-Product/Common Interest

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	DESCRIPTION	PRIVILEGE(S) ASSERTED
	5/28/02	
5	Email to S. Esrig from S. Silvers discussing joint strategy regarding intellectual property matter, 5/18/02	Work-Product/Common Interest Privilege
6	Email to S. Esrig from S. Silvers discussing trademark litigation strategy, 5/06/02	Work-Product/Common Interest Privilege
7	Email to S. Esrig from S. Silvers discussing trademark litigation strategy, 5/05/02	Work-Product/Common Interest Privilege
8	Email to S. Esrig from S. Silvers discussing joint strategy regarding intellectual property matters and financing, 5/03/02	Work-Product/Common Interest Privilege
9	Email to S. Esrig from S. Silvers (cc: gparde@kingump.com) discussing joint strategy regarding intellectual property protection, growth, and litigation strategies, 3/05/02	Attorney-Client/Work-Product/Common Interest Privilege
10	Email to S. Esrig from S. Silvers discussing joint strategy regarding intellectual property protection and litigation, 2/28/02	Work-Product/Common Interest Privilege
11	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 7/28/03	Work-Product/Common Interest Privilege
12	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 7/28/03	Work-Product/Common Interest Privilege
13	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy and attorney matters, 7/27/03	Attorney-Client/Work-Product/Common Interest Privilege
14	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 7/27/03	Work-Product/Common Interest Privilege
15	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 6/20/03	Work-Product/Common Interest Privilege
16	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 5/27/03	Work-Product/Common Interest Privilege
17	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy and hiring of counsel, 11/05/03	Attorney-Client/Work-Product/Common Interest Privilege
18	Email draft (and copy) to John Neubauers from S. Silvers includes commentary on trademark protection/litigation strategy, not dated.	Work-Product/Common Interest Privilege
19	Letter to S. Silvers from S. Esrig re: records of correspondence with John Neubauers, 2/28/03	Work-Product/Common Interest Privilege
20	Email to S. Esrig from S. Silvers (cc: J. Depue) includes trademark protection/litigation strategy, 4/17/04	Work-Product/Common Interest Privilege
21	Email to S. Esrig from S. Silvers (cc: J. Depue) discussing trademark protection/litigation strategy and	Work-Product/Common Interest Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
	other intellectual property matters, 4/15/04	
22	Letter to S. Esrig from S. Silvers discussing consulting and licensing issues and trademark protection/litigation strategy, 3/1/04	Work-Product/Common Interest Privilege
23	Forwarded Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy, 2/25/04	Work-Product/Common Interest Privilege
24	Email to S. Esrig from S. Silvers re: World Intellectual Property Organization and Uniform Domain Name Resolution Dispute Policy issues, including trademark protection/litigation strategy and hiring of counsel, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
25	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy and attorney matters, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
26	Email to S. Esrig from S. Silvers discussing reversionary rights and instructions to counsel, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
27	Email to S. Esrig from S. Silvers discussing reversionary rights, trademark protection/litigation strategy, and instructions to counsel, 2/05/04	Attorney-Client/Work-Product/Common Interest Privilege
28	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy and attorney matters, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
29	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy, 1/20/04	Work-Product/Common Interest Privilege
30	Newspaper article mailed to S. Esrig from S. Silvers, containing handwritten mental impressions concerning trademark protection/litigation strategy, 6/27/02	Common Interest Privilege
31	Email to J. DePue from S. Silvers (forwarded by DePue to A. Warren) discussing encroaching trademark infringement, 4/20/04	Work-Product/Common Interest Privilege
32	Letter to L. Hefter from S. Silvers re: Hefter's 9/15/04 letter, containing discussion of protection of intellectual property and trademark litigation strategy, 10/05/04	Attorney-Client/Work-Product
33	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue) including trademark protection/litigation strategy and attorney matters, 4/31/04	Attorney-Client/Work-Product/Common Interest Privilege
34	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue) discussing retention of counsel and trademark protection/litigation strategy, 5/09/04	Attorney-Client/Work-Product/Common Interest Privilege
35	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue) discussing retention of counsel and trademark protection/litigation strategy, 5/03/04	Attorney-Client Privilege/Work-Product/Common Interest Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
36	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy, 5/01/04	Work-Product/Common Interest Privilege
37	Email to S. Esrig from S. Silvers (cc: J. Depue) discussing intellectual property and trademark protection/litigation strategy, 4/17/04	Work-Product/Common Interest Privilege
38	Email to S. Esrig from S. Silvers discussing intellectual property, trademark protection/litigation strategy, and attorney matters 4/15/04	Attorney-Client/Work-Product/Common Interest Privilege
39	Email to S. Esrig from S. Silvers (cc: J. Depue) (also forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, 4/08/04	Work-Product/Common Interest Privilege
40	Email to S. Esrig from S. Silvers (also forwarded by Esrig to J. Depue) including domain names renewal discussion and trademark protection/litigation strategy, 4/03/04	Work-Product/Common Interest Privilege
41	Email to S. Esrig from S. Silvers (also forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, 4/01/04	Work-Product/Common Interest Privilege
42	Email to S. Esrig from S. Silvers (also forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, 3/04/04	Work-Product/Common Interest Privilege
43	Email to S. Esrig from S. Silvers (also forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, 3/04/04	Work-Product/Common Interest Privilege
44	Letter (and draft) to S. Silvers from S. Esrig responding to Silvers' 3/01/04 letter addressing consulting and licensing issues and trademark protection/litigation strategy, 3/19/04	Work-Product/Common Interest Privilege
45	Email to S. Silvers from S. Esrig discussing research on USPTO trademark(s) status for self and for competitors, 3/18/04	Work-Product/Common Interest Privilege
46	Email to S. Esrig from S. Silvers (cc: J. Depue) discussing trademark protection/litigation strategy and issues with counsel of record, 4/17/04	Attorney-Client/Work-Product/Common Interest Privilege
47	Email to S. Esrig from S. Silvers including litigation strategy, 3/18/04	Work-Product/Common Interest Privilege
48	Email to S. Esrig from S. Silvers (cc: J. Depue) including trademark registration, litigation strategy, and attorney matters, 3/13/04	Attorney-Client/Work-Product/Common Interest Privilege
49	Email to S. Esrig from S. Silvers including analysis of trademark protection scenarios and litigation strategy, 2/24/04	Work-Product/Common Interest Privilege
50	Email to S. Esrig from S. Silvers including trademark	Attorney-Client/Work-

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	DESCRIPTION	PRIVILEGE(S) ASSERTED
	protection/litigation strategy and instructions to counsel of record, 2/10/04	Product/Common Interest Privilege
51	Email to S. Esrig from S. Silvers including analysis of trademark protection scenarios, World Intellectual Property Organization and Uniform Domain Name Resolution Dispute Policy proceedings and general litigation strategies and discussing hiring of competent counsel, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
52	Email to S. Esrig from S. Silvers discussing domestic and international trademark protection, authorization to issue cease and desist orders to infringing parties, general litigation strategy, and instructions to counsel, 2/09/04	Attorney-Client/Work-Product/Common Interest Privilege
53	Email to S. Esrig from S. Silvers including litigation strategy and attorney matters, 2/09/04	Attorney-Client/Work-Product/Common Interest
54	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, instructions to counsel, 2/05/04	Attorney-Client/Work-Product/Common Interest Privilege
55	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue) including trademark protection/litigation strategy, 1/31/04	Work-Product/Common Interest Privilege
56	Email to S. Esrig from S. Silvers and attached memo (forwarded by Esrig to J. Depue and M. Shepard) including trademark protection/litigation strategy and instructions to counsel, e-mail dated 1/28/04; memo dated 1/26/04	Attorney-Client/Work-Product/Common Interest Privilege
57	Email to S. Esrig from S. Silvers and attached memo (forwarded by Esrig to J. Depue and M. Shepard) including trademark protection/litigation strategy and instructions to counsel, e-mail dated 1/28/04; memo dated 1/24/04	Attorney-Client/Work-Product/Common Interest Privilege
58	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue and M. Shepard) including trademark protection/litigation strategy, 1/20/04	Work-Product/Common Interest Privilege
59	Email to S. Esrig from S. Silvers (forwarded by Esrig to J. Depue and M. Shepard) including trademark protection/litigation strategy and instructions to counsel, 1/28/04	Attorney-Client/Work-Product/Common Interest Privilege
60	Memo to S. Esrig from Ira Edell including trademark issues raised in S. Silvers' letter dated 11/10/03, memo dated 11/12/03	Attorney-Client/Work-Product/Common Interest Privilege
61	Excerpt from a 9/05/03 letter to Stelor Productions from S. Silvers discussing control of intellectual property	Work-Product/Common Interest Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
	rights	
62	Letter to Stelor Productions from S. Silvers discussing control and protection of intellectual property rights, 11/10/03	Work-Product/Common Interest Privilege
63	Letter to Stelor Productions from S. Silvers discussing dispute over control and protection of intellectual property rights, 11/07/03	Work-Product/Common Interest Privilege
64	Email to S. Esrig from S. Silvers includes trademark protection/litigation strategy and hiring of counsel, 11/05/03	Attorney-Client/Work-Product/Common Interest Privilege
65	Full body of the 11/05/03 letter to Stelor Productions from S. Silvers re control of intellectual property rights	Work-Product/Common Interest Privilege
66	Email to S. Esrig from S. Silvers re: trademark protection/litigation strategy and instructions to counsel, 10/09/03	Attorney-Client/Work-Product/Common Interest Privilege
67	Email to S. Esrig from S. Silvers including discussion of trademark protection/litigation strategy, 09/27/03	Work-Product/Common Interest Privilege
68	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 09/21/03	Work-Product/Common Interest Privilege
69	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 09/16/03	Work-Product/Common Interest Privilege
70	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy and attorney matters, 09/02/03	Attorney-Client/Work-Product/Common Interest Privilege
71	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, and instructions to counsel 08/30/03	Attorney-Client/Work-Product/Common Interest Privilege
72	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, and instructions to counsel 08/25/03	Attorney-Client/Work-Product/Common Interest Privilege
73	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 07/30/03	Work-Product/Common Interest Privilege
74	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 07/28/03	Work-Product/Common Interest Privilege
75	Email to S. Esrig from S. Silvers including discussion	Work-Product/Common Interest

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	DESCRIPTION	PRIVILEGE(S) ASSERTED
	of intellectual property protection/litigation strategy, 07/28/03	Privilege
76	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, and instructions for counsel, 07/27/03	Attorney-Client/Work-Product/Common Interest Privilege
77	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, and instructions for counsel, 07/27/03	Attorney-Client/Work-Product/Common Interest Privilege
78	Email to S. Esrig from S. Silvers discussing control and protection of intellectual property rights and related financial matters, 7/23/03	Work-Product/Common Interest Privilege
79	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 07/16/03	Work-Product/Common Interest Privilege
80	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 07/15/03	Work-Product/Common Interest Privilege
81	Email to S. Esrig from S. Silvers including discussion of intellectual property protection/litigation strategy, 07/14/03	Work-Product/Common Interest Privilege
82	Email to S. Esrig from S. Silvers discussing control and protection of intellectual property rights and related financial matters, 7/08/03	Work-Product/Common Interest Privilege
83	Email to S. Esrig from S. Silvers discussing control and protection of intellectual property rights and related financial matters, 7/08/03	Work-Product/Common Interest Privilege
84	Document prepared logging communications by S. Silvers with S. Esrig and F. Hildebrand discussing various matters, including control and protection of intellectual property rights and related financial matters. Covers the period 4/01/03 through week of 7/07/03	Work-Product/Common Interest Privilege
85	Email to fred@stelorproduction.com from S. Silvers discussing control and protection of intellectual property rights and related financial matters, 7/07/03	Work-Product/Common Interest Privilege
86	Email to fred@stelorproduction.com (cc: S. Esrig) from S. Silvers discussing control and protection of intellectual property rights and related financial matters, 7/05/03	Work-Product/Common Interest Privilege
87	Email to S. Esrig from S. Silvers discussing growth and	Work-Product/Common Interest

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	DESCRIPTION	PRIVILEGE(S) ASSERTED
	protection of intellectual property rights, the intellectual property of competitors, and related financial matters, 7/04/03	Privilege
88	Email to S. Esrig from S. Silvers discussing strategic growth and expansion of intellectual property, the intellectual property of competitors, and related matters, 7/03/03	Work-Product/Common Interest Privilege
89	Email to S. Esrig from S. Silvers discussing strategic growth, expansion, and protection of their intellectual property, 6/25/03	Work-Product/Common Interest Privilege
90	Email to S. Esrig from S. Silvers includes discussion re: strategic expansion and protection of their intellectual property, both domestically and abroad, and the actions of competitors, 6/20/03	Work-Product/Common Interest Privilege
91	Email to S. Esrig from S. Silvers includes discussion re: expansion and protection of their intellectual property, both domestically and abroad, 5/02/03	Work-Product/Common Interest Privilege
92	Email to S. Esrig from S. Silvers includes discussion re: strategic expansion and protection of their intellectual property, both domestically and abroad, 4/30/03	Work-Product/Common Interest Privilege
93	Memo from S. Silvers to Stelor employee re: 24 month projection list of priorities for the expansion, promotion and financing of their intellectual property, 4/28/03	Work-Product/Common Interest Privilege
94	Email to S. Esrig from S. Silvers includes discussion re: importance of and strategy for protection of their intellectual property, both domestically and abroad, 4/20/03	Work-Product/Common Interest Privilege
95	Email to S. Esrig from S. Silvers includes discussion re: potential litigation 4/20/03	Work-Product/Common Interest Privilege
96	Email to S. Esrig from S. Silvers includes discussion re: potential litigation 4/17/03	Work-Product/Common Interest Privilege
97	Email to S. Esrig from S. Silvers includes discussion re: potential litigation 4/17/03	Work-Product/Common Interest Privilege
98	Email chain between S. Silvers and S. Esrig re: consulting agreement 12/24/02 and 12/25/02	Work-Product/Common Interest Privilege
99	Annotated copy of letter to S. Esrig from S. Silvers re: Silvers response to Stelor's correspondence dated 11/06/02 dealing with consulting agreement, 11/21/02	Work-Product/Common Interest Privilege
100	E-mail chain among S. Silvers, R. Rothstein, and Egg International re: consulting agreement, 11/6 through 11/07/02.	Work-Product/Common Interest Privilege
101	Email to S. Esrig from S. Silvers re: patent issue, 10/14/02	Work-Product/Common Interest Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
102	Email to John Neubauers from S. Silvers forwarded to S. Esrig re: international intellectual property expansion and protection of Trademark issue, 9/06/02	Work-Product/Common Interest Privilege
103	Email to S. Esrig from S. Silvers discussing litigation, 5/18/02	Work-Product/Common Interest Privilege
104	Email to S. Esrig from S. Silvers discussing litigation, 5/06/02	Work-Product/Common Interest Privilege
105	Email to S. Esrig from S. Silvers discussing litigation, 5/05/02	Work-Product/Common Interest Privilege
106	Email to S. Esrig from S. Silvers discussing litigation, 5/03/02	Work-Product/Common Interest Privilege
107	Email to S. Esrig from S. Silvers discussing revised agreement, 11/27/01	Work-Product/Common Interest Privilege
108	Email to S. Silvers from S. Esrig discussing hiring of counsel, 11/06/01	Attorney-Client/Work-Product/Common Interest Privilege
109	Email to Eric Cowan from S. Silvers discussing protection of intellectual property, 11/06/01	Attorney-Client
110	Email to K. Kaplan from S. Silvers re: settlement of litigation with Silvers, 9/02/06	Settlement/Mediation Privilege
111	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 9/01/06	Settlement/Mediation Privilege
112	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/29/06 and 8/30/06	Settlement/Mediation Privilege
113	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/27/06	Settlement/Mediation Privilege
114	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/24/06	Settlement/Mediation Privilege
115	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/21/06	Settlement/Mediation Privilege
116	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/18/06	Settlement/Mediation Privilege
117	Email chain between K. Kaplan and H. Tropin (cc: L. Hefter) re: settlement of litigation with Silvers, 5/10/06	Settlement Privilege/Common Interest Privilege
118	Email to L. Hefter from H. Tropin (cc: K. Kaplan) re: settlement of litigation with Silvers, 2/16/06	Settlement Privilege/Common Interest Privilege
119	Email chain between L. Hefter and H. Tropin (cc: K. Kaplan) re: settlement of litigation with Silvers, 2/11/06 and 2/14/06	Settlement Privilege/Common Interest Privilege
120	Email chain between K. Kaplan and H. Tropin (cc: L. Hefter) re: settlement of litigation with Silvers, 1/25/06	Settlement Privilege/Common Interest Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
	and 1/26/06	
121	Email to K. Kaplan from H. Tropin re: settlement of litigation with Silvers, 12/16/05	Settlement Privilege/Common Interest Privilege
122	Email chain between K. Kaplan and H. Tropin (cc: G. McQuilkin) re: settlement of litigation with Silvers, 2/09/06	Settlement Privilege/Common Interest Privilege
123	Email chain between B. Burlington and H. Tropin (cc: G. McQuilkin; K. Kaplan; and K. Hartmann) re: settlement of litigation with Silvers, 1/31/06	Settlement Privilege/Common Interest Privilege
124	Email chain between K. Kaplan and H. Tropin re: settlement of litigation with Silvers, 1/27/06	Settlement Privilege/Common Interest Privilege
125	Email chain between B. Burlington and H. Tropin (cc: K. Kaplan) re: settlement of litigation with Silvers, 1/13/06	Settlement Privilege/Common Interest Privilege
126	Email to K. Kaplan; A. Rabin from G. McQuilkin (cc: S. Silvers and K. Harmann) re: settlement of litigation with Silvers, 8/07/06	Settlement Privilege/Common Interest Privilege
127	Email chain between K. Kaplan and A. Rabin (cc: S. Silvers; G. McQuilkin; K. Hartmann; L. Hefter) re: settlement of litigation with Silvers, 8/07/06, 8/08/06	Settlement Privilege/Common Interest Privilege
128	Email chain between K. Kaplan and G. McQuilkin re: settlement of litigation with Silvers, 8/2/06	Settlement Privilege/Common Interest Privilege
129	Email to K. Kaplan from G. McQuilkin re: settlement of litigation with Silvers--USPTO correspondence attached, 7/25/06	Settlement Privilege/Common Interest Privilege
130	Email chain between K. Kaplan and A. Rabin (cc: S. Silvers; G. McQuilkin; K. Hartmann) re: settlement of litigation with Silvers, 6/05/06	Settlement Privilege
131	Email chain between K. Kaplan and A. Rabin (cc: S. Silvers; G. McQuilkin; K. Hartmann) re: settlement of litigation with Silvers, 6/05/06 and 6/06/06	Settlement Privilege
132	Email chain between K. Kaplan, G. McQuilkin and A. Rabin (cc: S. Silvers; K. Hartmann; L. Hefter) re: settlement of litigation with Silvers —with attached settlement draft, 8/07/06, 8/08/06 and 8/09/06	Settlement Privilege
133	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 8/10/06, 8/17/06, 8/18/06	Settlement Privilege
134	Email chain between K. Kaplan and A. Rabin re: settlement of litigation with Silvers, 8/30/06	Settlement/Mediation Privilege
135	Email to K. Kaplan from A. Rabin re: settlement of litigation with Silvers, 8/17/06	Settlement/Mediation Privilege

	DESCRIPTION	PRIVILEGE(S) ASSERTED
136	Email chain between K. Kaplan, and A. Rabin (cc: S. Silvers; K. Hartmann; L. Hefter G. McQuilkin;) re: settlement of litigation with Silvers, 8/07/06, 8/08/06	Settlement/Mediation Privilege
137	Email to K. Kaplan from A. Rabin re: settlement of litigation with Silvers, 8/07/06	Settlement/Mediation Privilege
138	Email to K. Kaplan from A. Rabin re: settlement of litigation with Silvers, 8/07/06	Settlement/Mediation Privilege
139	Email to K. Kaplan from A. Rabin (cc: S. Silvers; K. Hartmann; G. McQuilkin;) re: settlement of litigation with Silvers—with attached settlement draft, 8/05/06	Settlement/Mediation Privilege
140	Email to K. Kaplan from S. Silvers re settlement of litigation with Silvers, 10/3/06	Settlement Privilege
141	Email chain between K. Kaplan and A. Rabin re: settlement of litigation with Silvers, 9/28/06	Settlement Privilege
142	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 9/24/06, 9/25/06, 9/26/06	Settlement Privilege
143	Email chain between K. Kaplan and S. Silvers re: settlement of litigation with Silvers, 9/24/06, 9/25/06	Settlement Privilege
144	Memo to D. Blonsky from G. McQuilkin re: settlement of litigation with Silvers, 5/2/04	Settlement Privilege
145	Fax/Letter to G. McQuilkin from D. Blonsky re: settlement of litigation with Silvers—with attachments, 4/29/05	Settlement Privilege
146	Letters to S. Esrig from G. McQuilkin re: settlement of litigation with silvers, 4/27/05, 11/12/04, 1/13/05	Settlement Privilege
147	Letter to G. McQuilkin from K. Kaplan re: settlement of litigation with Silvers w/attachments, 4/14/05	Settlement Privilege
148	Emails between K. Kaplan and G. McQuilkin re: settlement of litigation with Silvers, 3/02/05 and 3/05/05	Settlement Privilege
149	Letter to B. Redding from K. Kaplan re: settlement of litigation with Oogles and Googles—with attached draft license agreement, 6/21/05	Settlement Privilege
150	Letter to H. Tropin from B. Burlington and K. Kaplan re: settlement of litigation with Silvers, 1/18/06	Settlement Privilege/Common Interest Privilege
151	Letter/Fax to G. McQuilkin from K. Kaplan re: settlement of litigation with Silvers, 4/28/05	Settlement Privilege/Common Interest Privilege
152	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy and attorney matters, 4/10/03	Attorney-Client/Work-Product/Common Interest Privilege
153	Email to brinan1@earthlink.net from S. Silvers	Attorney-Client/Work-Product

	DESCRIPTION	PRIVILEGE(S) ASSERTED
	including discussion of intellectual property ownership and legal matters, 4/31/03	
154	Email to S. Esrig from S. Silvers discussing contacting counsel, potential lawsuit, and trademark rights, 3/30/03	Attorney-Client/Work-Product/Common Interest Privilege
155	Email to brinan1@earthlink.net from S. Silvers (cc: lauretta.demeo@ichotelsgroup.com) including legal strategy and attorney matters, 5/01/04	Attorney-Client/Work-Product
156	Email to S. Esrig from S. Silvers discussing contacting counsel and legal strategy, 4/27/04	Attorney-Client/Work-Product/Common Interest Privilege
157	Email to Julie@stelorproductions.com from S. Silvers including trademark and attorney matters, 4/01/03	Attorney-Client/Work-Product/Common Interest Privilege
158	Email to S. Esrig from S. Silvers re: domain name addendum w/attached draft, 2/10/04	Work-Product/Common Interest Privilege
159	Email to S. Esrig from S. Silvers re: domain name addendum w/attached draft, 2/10/04	Work-Product/Common Interest Privilege
160	Memo re: domain name registration	Work-Product/Common Interest Privilege
161	Email to S. Esrig from S. Silvers re: World Intellectual Property Issue, 1/20/04	Work-Product/Common Interest Privilege
162	Internal Stelor fax of Draft of document originally faxed from Henry Epstein to Steve Esrig re: S. Silvers background, no date	Work-Product/Common Interest Privilege
163	Email to S. Esrig from S. Silvers re: domain name registration, 10/24/03	Work-Product/Common Interest Privilege
164	Email to S. Esrig from S. Silvers including trademark protection/litigation strategy and attorney matters, 9/08/03	Attorney-Client/Work-Product/Common Interest Privilege
165	Email to S. Esrig from S. Silvers discussing strategic cultivation and expansion of their own intellectual property as well as analysis of competitors, 8/25/03	Work-Product/Common Interest Privilege
166	Email to C. Fischer from S. Silvers including intellectual property protection/litigation strategy and attorney matters, 7/03/03	Attorney-Client/Work-Product/Common Interest Privilege
167	Email to S. Esrig from S. Silvers including intellectual property protection/litigation strategy, 7/02/03	Attorney-Client/Work-Product/Common Interest Privilege
168	Email to brinan1@earthlink.net from S. Silvers including discussion of intellectual property ownership and legal matters, 6/30/03	Work-Product/Common Interest

	DESCRIPTION	PRIVILEGE(S) ASSERTED
169	Email to S Esrig from S. Silvers including discussion of intellectual property ownership and legal matters, 6/30/03	Work-Product/Common Interest
170	Email to brinan1@earthlink.net from S. Silvers including discussion of intellectual property ownership, 6/26/03	Work-Product/Common Interest
171	Email to S Esrig from S. Silvers including discussion of intellectual property ownership and legal matters, 6/07/03	Work-Product/Common Interest
172	Email to S Esrig from S. Silvers including discussion of intellectual property ownership and legal matters, 5/17/03	Work-Product/Common Interest
173	Email to S Esrig (cc: fred@stelorproductions.com) from S. Silvers including discussion licensing show and strategy for cultivating and expanding intellectual property, 5/17/03	Work-Product/Common Interest
174	Email to S Esrig (cc: fred@stelorproductions.com) from S. Silvers including discussion of strategy for cultivating and expanding intellectual property and protecting associated rights, 5/17/03	Work-Product/Common Interest
175	Email to S. Esrig from S. Silvers discussing strategic cultivation and expansion of their intellectual property world-wide, 4/30/03	Work-Product/Common Interest Privilege
176	Email to S. Esrig from S. Silvers discussing strategic cultivation and expansion of intellectual property, and ownership and control rights, 4/22/03	Work-Product/Common Interest Privilege
177	Email to brinan1@earthlink.net from S. Silvers including discussion of trademark issue and legal strategy, 3/31/03	Work-Product/Common Interest
178	Email to brinan1@earthlink.net from S. Silvers including discussion of intellectual property ownership and related legal matters, 3/31/03	Work-Product/Common Interest
179	Email to brinan1@earthlink.net from S. Silvers including discussion of intellectual property ownership and related legal matters, 3/30/03	Work-Product/Common Interest
180	Email to S. Esrig from S. Silvers including discussion of trademark and patent matters, 5/02/03, forwarded same day to Fred Hildebrand by S. Esrig	Work-Product/Common Interest
181	Email chain between S. Esrig and S. Silvers including discussion of intellectual property rights and litigation, 10/02/02	Work Product/Common Interest
182	Email to S Esrig from S. Silvers including discussion of intellectual property ownership and protection, 9/12/02	Work-Product/Common Interest

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	DESCRIPTION	PRIVILEGE(S) ASSERTED
183	Email chain between S. Esrig and S. Silvers including discussion of intellectual property ownership and control and contractual relationship between the parties 9/10/02	Work Product/Common Interest
184	Email to S Esrig from S. Silvers re: FW Trademark Chronology, 8/14/02	Work-Product/Common Interest
185	Email to S Esrig from S. Silvers including forwarded email from Silvers to maitfam@unidial.com discussing domain name renewal, intellectual property rights, protection and legal stance, 8/10/02	Work-Product/Common Interest
186	Email chain between S. Esrig and S. Silvers re: Verisign domain names, 8/08/02	Work Product/Common Interest
187	Email chain between S. Esrig and S. Silvers re: Verisign domain names, 8/08/02	Work Product/Common Interest
188	Email to S Esrig from S. Silvers discussing control of intellectual property and containing related Godaddy.com correspondence with Silver, 10/12/03	Work-Product/Common Interest