Silvers v. Google, Inc. Doc. 198

Case 9:05-cv-80387-KLR

Document 198 Entered on FLSD Docket 11/28/2006

Page 1 of 4

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.

AGREED MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY MEMORANDUM IN SUPPORT OF STELOR PRODUCTIONS, LLC'S MOTION FOR SUMMARY JUDGMENT AGAINST STEVEN SILVERS

STELOR PRODUCTIONS, LLC, by and through its undersigned attorneys, hereby files this Motion for Enlargement of Time to file a reply memorandum in support of its Summary Judgment Motion against Steven Silvers (D.E. 140):

BURLINGTON · SCHWIEP · KAPLAN & BLONSKY, P.A.

1. Stelor filed its Motion for Summary Judgment against Silvers on October 12,

2006. (D.E. 140). The Court enlarged the time for Silvers to respond to the Summary Judgment

Motion to November 17, 2006. (D.E. 190).

2. On November 17, 2006, Silvers filed his opposing memorandum to the Summary

Judgment Motion (D.E. 193) and a Motion for Extension of Time to File Statement of Disputed

Facts. (D.E. 194).

3. On November 17, 2006, this Court granted Silvers' Motion for an Extension of

Time to File a Statement of Disputed Facts, permitting Silvers until November 30, 2006 to file

his statement of disputed facts in opposition to Stelor. (D.E. 197).

4. Based on the filing of Silvers opposing memorandum, Stelor's Reply

Memorandum would be due on November 30, 2006. In light of the enlargement of time granted

to Silvers to provide his statement of disputed facts, however, Stelor requests that its filing

deadline be extended.

5. The extension is required in order to allow Stelor the opportunity to address

Silvers' complete opposition papers, including the contents of the still-to-be-filed statement of

disputed facts.

6. Accordingly, Stelor requests that the deadline for service of its Reply be set for

December 8, 2006.

WHEREFORE, Stelor respectfully requests entry of an agreed order enlarging to

December 8, 2006, the time for Stelor to file its Reply Memorandum in Support of Its Summary

Judgment Motion Against Silvers.

2

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules 7.1, counsel for Stelor conferred with counsel for Silvers, and he agrees with the relief requested in this Motion.

Respectfully submitted,

s/Kevin C. Kaplan - Florida Bar No. 933848 David J. Zack - Florida Bar No. 641685

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Counsel for STELOR PRODUCTIONS,

LLC and STEVEN ESRIG

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2006, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Kevin C. Kaplan

3

Page 4 of 4

SERVICE LIST

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4