

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.
_____ /**MOTION FOR ORDER ALLOWING MULTIMEDIA PRESENTATION**

Counter-Defendant Stelor Productions, LLC, by and through its counsel, respectfully moves this Court, for an order allowing a multimedia presentation at the summary judgment hearing scheduled for January 4, 2007 and at trial, and as grounds for this motion states as follows:

Because of the complexity of this litigation, the number of documents involved, and the extensive testimony that will be presented on videotape, Stelor would like to use the Trial

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Graphix Multimedia Presentation System to facilitate the presentation of evidence at trial. Stelor would like to make use of this system that enables it to publish exhibits and videotaped trial testimony to the court and jury through the use of several computer monitors in the courtroom. The system also includes one high resolution projector and various peripheral devices to support the courtroom network. There are many advantages to using this medium in presenting evidence at trial, the principal one of which is that it shortens trial time. For instance, video depositions may be accessed by bar-code and played instantaneously without loading and ejecting a different videotape or searching for a specific part of a deposition. Other particularly useful features of the system include full-screen imaging of documents, split screen (side-by-side) display of documents, and highlighting of documents in a manner that is visible to the Court, the jury, and the parties. Stelor also requests permission for counsel to use laptops and Blackberry cellphones.

If the Court grants permission to use the system, Stelor's vendor, TrialGraphix, Inc., requests the opportunity to set up the system in the Courtroom on the afternoon of January 3, 2007, at the Court's convenience and discretion.

If the Court grants permission to use the system, representatives from Trial Graphix will consult with the U.S. Marshall's office as to all logistics in bringing the system into the Courthouse.

WHEREFORE, for the foregoing reasons, Stelor respectfully moves this Court for an order:

- 1) allowing Stelor to publish evidence through computer monitors at trial;

2) granting Trial Graphix permission to set up the system near the end of the day on January 3, 2007, at a time to be determined by the Court (approximately three hours are needed); and

3) granting Trial Graphix permission to enter (on January 3, 2007) and leave the building with the equipment at the conclusion of the trial.

Stelor has submitted a proposed Order to the Court.

Respectfully submitted,

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Counsel for STELOR PRODUCTIONS,
LLC and STEVEN ESRIG

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2007, 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

SERVICE LIST

**STEVEN A. SILVERS, Plaintiff, v. GOOGLE INC.
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