

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Palm Beach Division

STEVEN A. SILVERS, an individual,
Plaintiff,

v.

CASE NO. 05-80387-CIV

GOOGLES INC., a Delaware corporation,
Defendant.

(Ryskamp/Vitunac)

GOOGLES INC., a Delaware corporation,
Counterclaimant,

v.

STEVEN A. SILVERS, an individual; STELOR
PRODUCTIONS, INC., a Delaware corporation;
STELOR PRODUCTIONS, LLC; a business
entity of unknown form; and STEVEN ESRIG,
an individual,
Counterdefendants.

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff, Steven A. Silvers, hereby submits his initial disclosures pursuant to Rule 26(a),

Federal Rules of Civil Procedure.

Individuals Likely to Have Discoverable Information

1. Steven A. Silvers
8983 Okeechobee Blvd., Suite 202
PMB 203
West Palm Beach, FL 33411
2. Marsha Genero
301 San Jose Road
St. Augustine, Florida
3. Steven A. Esrig
Stelor Productions LLC
14701 Mockingbird Drive
Darnestown, Maryland 20874

4. Marty Jeffries
Stelor Productions LLC
14701 Mockingbird Drive
Darnestown, Maryland 20874
5. James Maitland
Aurora Collections, Inc.
4651 SW 51 Street
Davie, Florida 33314
6. Chris Farrington
Aurora Collections, Inc.
4651 SW 51 Street
Davie, Florida 33314
7. All employees of Stelor Productions
Stelor Productions LLC
14701 Mockingbird Drive
Darnestown, Maryland 20874
8. Employees of Aurora Collections, Inc.
4651 SW 51 Street
Davie, Florida 33314
9. Larry Page
Google, Inc.
1600 Amphitheatre Parkway
Mountainview, California 94043
10. Sergey Brin
Google, Inc.
1600 Amphitheatre Parkway
Mountainview, California 94043
11. Andrew Bridges
Winston & Strawn
101 California Street, Suite 3900
San Francisco, California 94111
12. Rose Hagen
Google, Inc.
1600 Amphitheatre Parkway
Mountainview, California 94043

13. Craig Silverstein
Google, Inc.
1600 Amphitheatre Parkway
Mountainview, California 94043
14. Douglas Edwards
Google, Inc.
1600 Amphitheatre Parkway
Mountainview, California 94043

Documents Supporting Claims

1. All documents attached to Plaintiff's First Amended Complaint.
2. All advertising and promotional materials for the "Googles" trademark.
3. Googles.com Web pages.
4. All music recordings relating to the "Googles" trademark.
5. News articles relating to Google.
6. All materials relating to all trademarks, applications to register trademarks, and trademark registrations relating to the mark "Googles."
7. All materials relating to all copyrights, patent, and domain names registrations relating to the mark "Googles."
8. All materials contained in the United States Patent and Trademark Office files for all trademark applications relating to the mark "Google."
9. All documents relating to petitions filed by Google to cancel or transfer domain names.

Damages Categories

1. Plaintiff's costs of corrective advertising to eliminate the confusion in an amount to be determined.

Insurance

1. Plaintiff is unaware of any insurance that covers the claims asserted in this action.

Respectfully submitted this 22nd day of November, 2005.

Adam T. Rabin (Fla. Bar #985635)
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West Palm Beach, Florida 33401
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s/ Gail A. McQuilkin
Kenneth R. Hartmann (Fla. Bar #664286)
Gail A. McQuilkin (Fla. Bar #969338)
KOZYAK TROPIN & THROCKMORTON, P.A.
2525 Ponce de Leon, 9th Floor
Miami, Florida 33134
T: 305-372-1800 / F: 305-372-3508

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

E-mail and U.S. mail on this 22nd day of November, 2005 upon:

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s/ Gail A. McQuilkin

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