

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Palm Beach Division

STELOR PRODUCTIONS, LLC,  
a Delaware limited liability company,

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 business entity of  
unknown form; and STEVEN ESRIG, an individual,  
Counterdefendants.

---

**CASE NO. 05-80387-CIV**

Ryskamp/Vitunac

**LOCAL RULE 16.1(B) JOINT SCHEDULING REPORT**

Plaintiff and Counterdefendant Stelor Productions, LLC; Defendant and Counterclaimant Google, Inc., and Counterdefendant Steven Esrig submit this Joint Scheduling Report pursuant to Rule 16.1(B) of the Local Rules. Counsel for the parties met telephonically on March 10, 2006, and as a result of this meeting and conversation, report as follows:

**1. Likelihood of Settlement.**

The parties have been unable to reach a settlement as of this time, but will continue to explore the possibility of settlement as the case develops.

**2. Likelihood of Appearance of Additional Parties.**

The parties consider the appearance of additional parties to be unlikely in this phase of the litigation.

**3. Proposed Limits on Time.**

- (a) To amend pleadings: November 16, 2007.
- (b) To file and hear motions: the parties propose that all pretrial motions and memorandums of law, except for summary judgment motions, be filed before the date of the final pretrial conference.
- (c) To complete non-expert discovery: July 31, 2008.
- (d) To disclose experts: April 18, 2008.
- (e) To disclose rebuttal experts: May 16, 2008.
- (f) To complete expert discovery: September 30, 2008.
- (g) To file case-dispositive motions: October 31, 2008.
- (h) The parties agree to cooperate in extending discovery deadlines if, despite reasonable diligence, additional time is needed to complete discovery.

**4. Formulation and Simplification of Issues.**

Counsel foresee working together to formulate and simplify the issues.

**5. Necessity/Desirability of Amending Pleadings.**

The parties anticipate amendments to the pleadings as a result of the resolution between Stelor and Silvers.

**6. Admissions of Fact and Documents.**

The parties agree to work together in good faith to stipulate to the admissibility of facts and documents.

**7. Avoidance of Unnecessary Proof/Cumulative Evidence.**

The parties agree to work together in good faith to avoid using unnecessary proof or cumulative evidence.

**8. Referral to Magistrate Judge.**

The parties agree that all pre-trial discovery matters, other than those that involve admissibility of evidence at trial, may be referred to Magistrate Judge for determination.

**9. Time for Trial.**

The parties believe that the case can be tried before a jury in five (5) days. Certain pretrial rulings may alter the time, or eliminate the need, for trial.

**10. Pretrial Dates.**

The parties propose to file their Joint Pretrial Stipulation 10 days before trial. The parties request that a Final Pretrial Conference be held 5 days before trial. The parties request that this case be set on the Court's trial calendar in February, 2009.

**11. Additional Information.**

The parties are not aware of any additional information that may be helpful to the Court in setting this case for status or pretrial conference.

**12. Bench/Jury Trial.**

The parties have requested a jury trial on all issues so triable.

**13. Joint Proposed Scheduling Order.**

The parties' Joint Proposed Scheduling Order is attached hereto.

Respectfully submitted this \_\_\_\_\_ day of October, 2007.

Attorneys for Plaintiff and Counterdefendant  
Stelor Productions, Inc., Stelor Productions, LLC,  
and Steven Esrig

Attorney for Defendant and Counterclaimant,  
Google, Inc.

/s/ Kevin C. Kaplan  
Kevin C. Kaplan, Esq.  
Coffey Burlington  
2699 S. Bayshore Drive  
Miami, FL 33133  
[kkaplan@coffeyburlington.com](mailto:kkaplan@coffeyburlington.com)

/s/ Ramsey Al-Salam  
Ramsey Al-Salam, Esq.  
PERKINS COIE LLP  
Suite 4800  
1201 Third Avenue  
Seattle, Washington 98101-3099  
[RAlsalam@perkinscoie.com](mailto:RAlsalam@perkinscoie.com)