

**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 TO ALTER THE SCHEDULING ORDER
RELATING TO NON-EXPERT DISCOVERY ONLY**

Pursuant to Local Rule 7.1 A.1(j) AND 16.1, the parties, Plaintiffs and Counterdefendants, STELOR PRODUCTIONS, INC. and STELOR PRODUCTIONS, LLC (collectively, “Stelor”), Counterdefendant, STEVEN ESRIG (“Esrig”), and Defendant and Counterclaimant, GOOGLE, INC. (“Google”) by and through their respective undersigned counsel, hereby file this Motion to Alter the Scheduling Order Relating to Non-Expert Discovery Only and state as follows:

1. The current non-expert discovery cutoff is July 31, 2008.
2. The parties have endeavored in good faith to complete discovery within the Court's discovery cutoff. During this process they realized the interrelation between the factual and expert discovery. Furthermore, Plaintiff and Counterdefendants have a pending discovery motion.
3. The Parties jointly request an extension of only the non-expert cutoff up to and including September 30, 2008 to coincide with the expert discovery deadline. In this way, all discovery will conclude on September 30, 2008.
4. This request is made for good cause and without the purpose of delay.
5. The parties agree that all other deadlines established by this Court's October 24, 2007 Scheduling Order are to remain the same.

WHEREFORE, the parties respectfully request that the Court issue an Order grant their request for additional time within which to complete the non-expert discovery deadline up to and including September 30, 2008, so that all discovery deadline cutoffs are September 30, 2008 and grant such other relief as may be deemed just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2008, 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 identified on the Mailing Information for Case 9:05-cv-80387-KLR. I also certify that the foregoing Counsel of record currently identified on the Mailing Information list to receive e-mail notices for this case are served via Notices of Electronic Filing generated by CM/ECF. Counsel of record who are not on the Mailing Information list to receive e-mail notices for this case have been served via U.S. Mail.

/s/ Morgan L. Swing