

Exhibit A



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June 23, 2008

Via E-mail and U.S. Mail

Ramsey Al-Salam, Esq.
Perkins Coie LLP
Suite 4800
1201 Third Avenue
Seattle, Washington 98101-3099

Re: *Silvers vs. Google, et al.*
Case No. 05-80387

Dear Ramsey:

Attached please find a list of Stelor Productions, LLC's Fed. R. Civ. P. 30(b)(6) designations on matters which we would like to question Google Inc.'s designee(s). Please let us know who you will designate and when the designee(s) will be available for deposition in Miami, Florida. Additionally, if you intend to conduct an additional deposition of Stelor's representatives, please advise us as soon as possible.

We look forward to your prompt response. Thank you for your cooperation.

Sincerely,

s/

Morgan L. Swing

Attachment

Exhibit A

1. The facts and circumstances pertaining to any of Defendant and Counterclaimant Google, Inc.'s (hereinafter, "Google") trademark and domain name search efforts, whether in a formal or informal manner.

2. The facts and circumstances surrounding the origin and selection of the GOOGLE trademark name and "google.com" domain name.

3. The facts and circumstances pertaining to Google's initial federal trademark application, registration, amendment, and any documents filed therewith.

4. The facts and circumstances surrounding any and all (pending, granted, or denied) federal trademark applications, registrations, amendments, and any documents filed therewith for the GOOGLE mark.

5. The facts and circumstances pertaining to Google's domain name registration.

6. The facts and circumstances pertaining to all domain name registrations by Google.

7. The facts pertaining to Google's trademark policies, institution, and retention, and the personnel responsible for trademarks.

8. The facts and circumstances pertaining to Google's knowledge of derivative "Google" federal trademarks or domain names.

9. The facts and circumstances pertaining to Google's initial use of its trademark and domain name.

10. The facts and circumstances pertaining to any commercial use of Google's search engine.

11. The facts and circumstances pertaining to Google's expansion of and right to expand its mark into markets other than those originally approved through Google's original

trademark applications, registrations, or amendments, as described in paragraphs 15, 16, and 17 of Google's Counterclaim.

12. The facts and circumstances pertaining to Google's use of its trademarks or domain names for advertising or sales of children's goods, including but not limited to children's books, clothing, toys, and education, and services on the Internet.

13. The facts and circumstances pertaining to Google's use of its trademarks or domain names for advertising for and providing links to sites selling children's books, games, and other educational and entertainment products and services.

14. The facts and circumstances pertaining to Google's federal trademark application for its mark "Google" in the children's market.

15. The facts and circumstances surrounding the beginnings of and continuous use by Google of the GOOGLE mark since 1997, as alleged in paragraph 13 of Google's Counterclaim.

16. The facts and circumstances pertaining to damages to Google due to public statements about Google made by Stelor Productions and Silvers, as alleged in paragraph 11 of Google's Counterclaim.

17. The facts and circumstances pertaining to Google's allegation in paragraph 12 of its Counterclaim that Silvers and Stelor Productions have no valid or enforceable rights in the alleged registered mark GOOGLES AND DESIGN.

18. The facts and circumstances pertaining to Google's statement in paragraph 61 of its Counterclaim that "The Googles Children Workshop, Inc. abandoned the GOOGLES AND DESIGN trademark and any GOOGLES trademark it ever claimed."

19. The facts and circumstances pertaining to Counterdefendants failure to use the GOOGLES trademark in good faith in the ordinary course of business, as alleged in paragraph 64 of Google's Counterclaim.

20. The facts and circumstances pertaining to Counterdefendants' lack of good-faith intent to use the mark GOOGLES AND DESIGN or any other GOOGLES mark, including GOOGLES EDUTAINMENT, in the ordinary course of business, as alleged in paragraph 65 of Google's Counterclaim.

21. The facts and circumstances surrounding Google's allegation of superior rights in its GOOGLE marks to any GOOGLES-related marks, as alleged in paragraph 66 of the Counterclaim.

22. The facts and circumstances pertaining to Google's allegation in paragraph 68 of the Counterclaim that "Google does not engage in any activities that harm or threaten any lawful rights of Counterdefendants."

23. The facts and circumstances pertaining to Counterdefendants lack of continuing rights in the federal trademark "GOOGLES," as alleged in paragraph 69 of Google's Counterclaim.

24. The facts and circumstances pertaining to harm to Google's reputation and goodwill, as alleged in paragraph 87 of its Counterclaim, by carefully timed press releases and public statements by Counterdefendants regarding their ownership of the mark GOOGLES and DESIGN.

25. The facts and circumstances pertaining to Google's tarnished reputation, as alleged in paragraph 89 of its Counterclaim.

26. The facts and circumstances pertaining to Google's attempts to invalidate trademarks and domain names.