

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

NO. 05-80387-CIV (Ryskamp/Vitunac)

STELOR PRODUCTIONS, INC., a Delaware  
corporation,

Plaintiff,

v.

GOOGLE INC., a Delaware corporation,

Defendant.

**NOTICE OF TAKING VIDEOTAPED DEPOSITION OF  
STELOR PRODUCTIONS, LLC (f/k/a STELOR PRODUCTIONS, INC.'S)  
CORPORATE REPRESENTATIVE PURSUANT TO  
FED. R. CIV. P. 30(b)(6)**

PLEASE TAKE NOTICE THAT pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure defendant Google Inc. ("Google") will take the deposition of plaintiff Stelor Productions, LLC 's (f/k/a Stelor Productions, Inc.'s) corporate representative as to all matters known or reasonably available to plaintiff relating to the matters identified in Attachment A annexed hereto, at the time and place indicated below:

| <b><u>NAME</u></b>  | <b><u>DATE AND TIME</u></b>   | <b><u>LOCATION</u></b>  |
|---|-------------------------------|---|
| Corporate representative of<br>Stelor Productions, LLC,<br>f/k/a Stelor Production, Inc.<br>on topics identified on<br>Attachment A | October 30, 2008<br>9:00 a.m. | Coffey Burlington<br>Office in the Grove, Penthouse<br>2699 S. Bayshore Drive, Penthouse A<br>Miami, FL 33133 |

The examination will continue from day to day until completed. The deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted

under the Rules of Civil Procedure. The deposition will be taken before a person designated under Fed. R. Civ. P. 28 and will be recorded stenographically and videotape.

Please take further notice that the 30(b)(6) witness is required to produce the documents and information requested in Attachment B annexed hereto.

In accordance with the Rules of Civil Procedure, you are invited to attend and to cross-examine.

Dated this 13<sup>th</sup> day of October, 2008.

By: 

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Attorneys for Defendant / Counterclaimant Google, Inc.

## ATTACHMENT A

### DEFINITIONS

1. The terms “Stelor,” “you,” “your” or “plaintiff” mean and include Stelor Productions, LLC, (f/k/a Stelor Productions, Inc.) and all related entities, parents, subsidiaries or divisions, and any predecessor or successor entities and any of its officers, directors, agents, attorneys, consultants, accountants, employees, representatives, and any other persons acting, or purporting to act for or on its behalf.
2. The terms “Google” or “defendant” mean Google Inc., and its officers, directors, agents, attorneys, consultants, accountants, employees, representatives, affiliates, and any other persons acting or purporting to act for or on its behalf.
3. The term “person,” unless otherwise specified, means any natural person, firm, partnership, association, corporation, business, proprietorship, government or quasi-governmental body, agency or commission, or any other organization or entity.
4. “The factual basis” means to describe in detail all evidentiary facts presently known to you or inferred to from the existence of other evidentiary and/or ultimate facts, to identify all persons having substantive knowledge of such facts, and to identify the facts known to such persons.
5. “Identify” or “state the identity” when used with respect to a document means to state the type of document, the date of the document, the name and title or position of the person that is signatory to the document, or the name and title or position of the person who prepared the document, the name and title or position of each recipient or addressee of such document (whether specifically named therein or not) either at the time of initial distribution or at some subsequent time, and a brief statement of the subject matter of the document. If the document

itself or a copy thereof has been provided, you may simply refer to the document and provide only the information requested above to the extent it is not unequivocally reflected in the document itself;

6. “Identify” or “state the identity” when used with respect to a person or entity, means to state with respect to each such person or entity:

- a. the full name;
- b. the last-known residence address and telephone number;
- c. the occupation, employer and business address at the date of the event to which the discovery request refers; and
- d. the present occupation, employer and business address.

### **30(b)(6) DEPOSITION TOPICS**

1. Stelor’s business, including its past and current investors, shareholders, owners, sales, products, services and profits, and its anticipated business or business plans.

2. The past, current and planned use(s) for the googles.com website.

3. The past, current and planned use(s) of the GOOGLES trademark.

4. The factual basis for Stelor’s assertion that the googles.com website has patent pending technology, including the nature of any patent application for the website.

5. The factual basis for Stelor’s assertion that there is a likelihood of confusion created by Google and/or Google’s activities in connection with Stelor’s trademark rights in “Googles.”

6. The factual basis for Stelor’s claim that it has suffered damages as a result of Google’s activities.

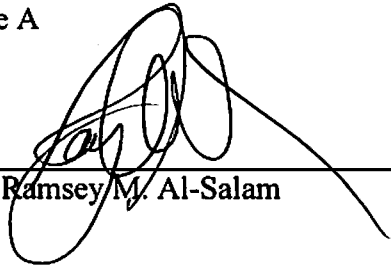
7. The factual basis for Stelor’s claim that its business has been impacted by Google’s activities.

8. The settlement between Stelor and Steven Silvers, including the negotiation that led to the settlement, the terms of the settlement, and all actions to comply with the settlement.
9. The basis for Stelor's responses to Google's discovery requests.
10. The identity of all documents relating to the topics above.
11. The identity of witnesses familiar with the facts above.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of October, 2008, I served a copy of the foregoing  
NOTICE OF TAKING VIDEOTAPED DEPOSITION OF STELOR PRODUCTIONS, LLC 'S  
(f/k/a STELOR PRODUCTIONS, INC'S ) CORPORATE REPRESENTATIVE on the  
following persons, by United States mail, postage prepaid and via email:

Kevin C. Kaplan  
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David J. Zack  
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Morgan L. Swing  
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Ramsey M. Al-Salam