UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA PALM BEACH DIVISION

Case No. 05-80387-CIV (Ryskamp/Vitunac)

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STEVEN A. SILVERS, an individual,

Plaintiff,

vs.

GOOGLE INC., a Delaware corporation,

Defendant.

GOOGLE INC., a Delaware corporation,

Counterclaimant,

vs.

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,

Counter-defendants.

GOOGLE INC.'S FIRST SET OF DOCUMENT REQUESTS

TO STELOR PRODUCTIONS, LLC

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendant and Counterclaimant

Google Inc. requests that you produce for inspection and copying the documents and things listed

below on May 10, 2006 at the offices of Adorno & Yoss LLP, 2525 Ponce de Leon Boulevard, Suite

400, Miami, Florida 33134 or at another location mutually agreed upon by both parties.

For the purpose of this request for production of documents and things, the following definitions and instructions shall apply.

INSTRUCTIONS

- 1. If you contend that any information, document, or thing otherwise called for by any request is excluded from production or discovery, answer so much of the discovery request as is not subject to the claimed objection and, for each document or thing:
 - a. State whether the item shall not be produced because:
 - 1) It is claimed to be privileged; or
 - 2) It once existed but can no longer be located; or
 - 3) It has been lost; or
 - 4) It has been destroyed; and
 - b. If, under a claim of privilege, any documents or things are not produced, you must state for each document:
 - 1) the type and title of the document or thing; and
 - the general subject matter of the content of the document or description of the thing; and
 - 3) the date of its creation and/or revision; and
 - 4) the identity of the document's author(s), addressee(s), and recipient(s); and
 - 5) the nature of the privilege being claimed; and
 - 6) ' in detail, all facts upon which you base your claim of privilege.
- 2. In producing these documents and things, you are requested to identify and produce for inspection and copying not only those documents and things in your custody, but all documents and things in the custody of your attorneys, consultants, agents, other representatives, and other persons or entities subject to your control.

- 3. You are to produce the original and all copies of each requested document and thing, as well as the file in which they are kept, including all copies which bear any additional file stamps, marginal notes, or other additional markings or writings that do not appear on the original.
- 4. Complete production is to be made on the date and at the time indicated above. The inspection and copying will begin at that time and will continue from day to day thereafter until completed.
- 5. You have a duty to supplement your responses from now until the time of hearing or trial, as provided by Federal Rule of Civil Procedure 26(e).

DEFINITIONS

- The terms "you" or "your" refer to counterdefendant Stelor Productions, LLC and includes any persons or entities controlled by or acting on behalf of you, including without limitation Steven Esrig, Stelor Productions, Inc., and all past and present licensees, agents, attorneys, predecessors, subsidiaries, parent companies, or affiliated companies and their agents, officers, directors, employees, representatives and attorneys.
- 2. The term "Google" refers to Defendant and Counterclaimant Google Inc. as well as its officers, directors, employees, and authorized representatives.
- The term "crossclaim" refers to the crossclaim filed by Stelor Productions, LLC against Steven Silvers in this action on September 9, 2005.
- 4. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34 and its interpretation by the courts, including originals, copies, drafts or other productions of any written, graphic or otherwise recorded matter, however produced or reproduced, whether inscribed by hand, by computer or by mechanical, electronic, or photographic means.

3

- 5. The term "concerning" means relating to, referring to, describing, reflecting, evidencing or constituting.
- 6. The terms "all" and "each" shall be construed to include all and each.
- 7. The term "and" shall be construed to include "or" and vice versa and shall be the logical equivalent of "and/or."
- 8. The term "amended complaint" refers to the first amended complaint filed in this action.
- 9. The use of the singular form of any word also includes the plural and vice versa.
- 10. The term MARKS refers to the GOOGLES and GOOGLES AND DESIGN marks as well as any other marks incorporating the letter string "GOOGLES."

DOCUMENTS AND THINGS REQUESTED

- All documents referring to, relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) The Googles Children's Workshop, Inc. was located at P.O. Box 60210, Potomac, Maryland 20859.
- All documents referring to, relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) The Googles Children's Workshop, Inc. was doing business at P.O. Box 60210, Potomac, Maryland 20859.
- All documents concerning communications referring to, relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) The Googles Children's Workshop, Inc. was doing business at P.O. Box 60210, Potomac, Maryland 20859.
- All documents referring to, relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) The Googles Children's Workshop, Inc. was doing business.

4

- 5. All documents referring to, relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) The Googles Children's Workshop, Inc. was the owner of Registration No. 2,087,590 dated August 12, 1997, as shown by the records in the United States Patent and Trademark Office.
- 6. All documents concerning The Googles Children's Workshop, Inc.
- 7. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning The Googles Children's Workshop, Inc.
- 8. All documents concerning Steven A. Silvers or Silvers Entertainment Group, Inc.
- 9. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning Steven A. Silvers or Silvers Entertainment Group, Inc.
- 10. All documents constituting or comprising your company charters; operating or management agreements; by-laws; investor agreements; qualifications to do business; incorporations or registrations; annual reports or returns required by law; other business filings required by law; board, management committee, or executive committee minutes relating to the conduct of your business; and statements of officers.
- 11. All documents concerning your management, operations, transactions, revenues, and assets related to the GOOGLES brand or mark, your business dealings with Steven A. Silvers or Silvers Entertainment Group, Inc., or your commercialization of intellectual property related to the GOOGLES brand or mark.
- 12. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications with Michael Silvers concerning the MARKS, The Googles Children's Workshop, Inc. or any allegations contained in the amended complaint or counterclaims.
- 13. All documents concerning the dissolution of The Googles Children's Workshop, Inc..

- 14. Your complete tax and accounting books and full corporate earnings reports for each year of your existence, including assets, revenues, costs, and profits reported to national or state tax authorities.
- 15. Documents sufficient to identify all of your directors, officers, and employees and their most recent available addresses and telephone numbers.
- All documents concerning The Googles Children's Workshop, Inc. not requested in the specific requests above.
- All documents concerning trademark research, investigations, and searches relating to the MARKS.
- 18. All documents concerning applications to register the MARKS with the United States Patent and Trademark Office, any registrations issued as a result thereof, and any efforts to secure or maintain registrations or to secure "incontestable" status.
- 19. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning applications to register the MARKS, any registrations of them, or any efforts to secure or maintain registrations or to secure "incontestable" status.
- 20. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications between you and anyone else regarding the MARKS, or products or services bearing or otherwise associated with the MARKS, in connection with declarations filed with the United States Patent and Trademark Office.
- All documents concerning the MARKS filed or sent on behalf of you to the United States
 Patent and Trademark Office.
- All documents filed or sent on behalf of Steven A. Silvers or The Googles Children's Workshop, Inc. to the United States Patent and Trademark Office.

- 23. All documents referring or relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) the mark described in Registration No. 2,087,590 dated August 12, 1997 in the United States Patent and Trademark Office was still in use by The Googles Children's Workshop or by a licensee of The Googles Children's Workshop on or in connection with the goods identified in the Certificate of Registration.
- 24. All documents referring or relating to, evidencing, or reflecting the fact or your belief that, as of March 25, 2003 (or at any time between January 1 and March 25, 2003) the mark described in Registration No. 2,087,590 dated August 12, 1997 in the United States Patent and Trademark Office had been in continuous use for more than five (5) years from June 1996, subsequent to the date of the registration, through to March 25, 2003, on or in connection with the goods identified in the Certificate of Registration.
- 25. All documents referring or relating to, reflecting, evidencing, constituting, or comprising your personal knowledge, information, belief, inquiries, and investigations regarding the facts alleged in declarations filed with the United States Patent and Trademark Office regarding Registration No. 2,087,590 dated August 12, 1997 and its underlying application; Application Serial No. 76/591,386 dated May 7, 2004; and Application Serial No. 78/420,234 dated May 17, 2004.
- 26. All documents constituting or comprising drafts of declarations, or drafts of portions of declarations for filing with the United States Patent and Trademark Office regarding Registration No. 2,087,590 dated August 12, 1997 and its underlying application; Application Serial No. 76/591,386 dated May 7, 2004; and Application Serial No. 78/420,234 dated May 17, 2004.

- All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications between you and anyone else regarding the facts alleged in the declarations filed with the United States Patent and Trademark Office regarding Registration No.
 2,087,590 dated August 12, 1997 and its underlying application; Application Serial No.
 76/591,386 dated May 7, 2004; and Application Serial No. 78/420,234 dated May 17, 2004.
- 28. All documents concerning Steven A. Silvers's or your intent to use the mark GOOGLES EDUTAINMENT at the time the declaration executed by Ira C. Edell regarding application serial no. 76/591,386 was filed with the United States Patent and Trademark Office.
- 29. All documents referring or relating to, evidencing, reflecting, constituting, or comprising your knowledge of the intent of any person, company or licensee to use the mark GOOGLES EDUTAINMENT at the time the declaration executed by Ira C. Edell regarding application serial no. 76/591,386 was filed with the United States Patent and Trademark Office.
- 30. All documents referring or relating to, reflecting, evidencing, constituting, or comprising your knowledge, information, belief, inquiries, and investigations regarding the facts alleged in the declaration executed by Ira C. Edell filed with the United States Patent and Trademark Office regarding application serial no. 76/591,386.
- 31. All documents concerning Steven A. Silvers's or your intent to use the mark GOOGLES at the time the declaration executed by Laurence Hefter regarding application serial no. 78/420,234 was filed with the United States Patent and Trademark Office.
- 32. All documents referring or relating to, evidencing, reflecting, constituting, or comprising your knowledge of the intent of any person, company or licensee to use the mark GOOGLES at the time the declaration executed by Laurence Hefter regarding application serial no. 78/420,234 was filed with the United States Patent and Trademark Office.

- 33. All documents referring or relating to, reflecting, evidencing, constituting, or comprising your knowledge, information, belief, inquiries, and investigations regarding the facts alleged in the declaration executed by Laurence Hefter filed with the United States Patent and Trademark Office regarding application serial no. 78/420,234.
- 34. All documents evidencing the appointment of Ira C. Edell or other attorneys with the firm of Edell, Shapiro & Finnan, LLC, as the attorneys to file a declaration and to transact all business in connection with Registration No. 2,087,590 and Application Serial No. 76/591,386 in the United States Patent and Trademark Office.
- 35. All documents concerning communications constituting or evidencing the appointment of Ira C. Edell or other attorneys with the firm of Edell, Shapiro & Finnan, LLC, as the attorneys to file a declaration and to transact all business in connection with Registration No. 2,087,590 and Application Serial No. 76/591,386 in the United States Patent and Trademark Office.
- 36. All documents evidencing the appointment of Laurence Hefter or other attorneys with the firm of Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. as the attorneys to file a declaration and to transact all business in connection with Application Serial No. 78/420,234.
- 37. All documents concerning communications constituting or evidencing the appointment of Laurence Hefter or other attorneys with the firm of Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. as the attorneys to file a declaration and to transact all business in connection with Application Serial No. 78/420,234.
- All documents concerning communications with any attorney for Steven A. Silvers, The Googles Children's Workshop, or Silvers Entertainment Group, Inc.
- 39. All documents in your possession, custody, or control that have at any time been in the possession, custody, or control of attorneys for Steven A. Silvers, The Googles Children's Workshop, or Silvers Entertainment Group, Inc.

40. All documents concerning any domain name registrations you filed or your efforts to secure domain names incorporating the letter string GOOGLE or GOO.

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- 41. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning any domain name registrations you filed or your efforts to secure domain names incorporating the letter string GOOGLE or GOO.
- 42. All documents concerning the conceptualization, design, creation, launch, publication, or modification of Web sites designed for you, established by you, or used in connection with the MARKS.
- 43. All documents concerning the conceptualization, design, creation, launch, publication, or modification of Web sites designed for or established by Steven A. Silvers, The Googles Children's Workshop, or Silvers Entertainment Group, Inc.
- 44. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning Web sites designed for you, established by you, or used in connection with the MARKS.
- 45. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning Web sites designed for or established by Steven A. Silvers, The Googles Children's Workshop, or Silvers Entertainment Group, Inc.
- 46. All documents concerning the Web sites stelor.com and stelorproductions.com or plans to develop the Web sites.
- 47. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning the development of the Web sites stelor.com and stelorproductions.com or plans to develop the Web sites.
- 48. All documents concerning the Web site googles.com or plans to develop the Web site.

- 49. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning the development of the Web site googles.com or plans to develop the Web site.
- 50. All documents concerning a Googles Web site or plans to develop a Googles Web site.
- 51. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning a Googles Web site or plans to develop a Googles Web site.
- 52. All documents concerning a Gootopia Web site or plans to develop a Gootopia Web site.
- 53. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning a Gootopia Web site or plans to develop a Gootopia Web site.
- 54. All financial statements showing expenditures on advertising and marketing activities concerning the MARKS or products or services bearing or otherwise associated with the MARKS.
- 55. All documents concerning advertising, marketing, and promotion of the MARKS or any products or services bearing or otherwise associated with the MARKS.
- 56. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning advertising, marketing, and promotion of the MARKS or any products or services bearing or otherwise associated with the MARKS.
- 57. All documents concerning the manufacture, distribution, sale, or offer of sale of any service or product bearing or otherwise associated with the MARKS.
- 58. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning the manufacture, distribution, or sale of any service or product bearing or otherwise associated with the MARKS.

- 59. All documents concerning assignments or licenses of the MARKS or other agreements concerning the MARKS, including all documents concerning the decision to enter into the assignments, licenses, or agreements.
- 60. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning assignments or licenses of the MARKS or other agreements concerning the MARKS.
- All documents concerning the License, Distribution, and Manufacturing Agreement dated
 June 1, 2002 between you and Steven A. Silvers.
- 62. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning the License, Distribution, and Manufacturing Agreement dated June 1, 2002 between you and Steven A. Silvers.
- All documents evidencing your use of the MARKS in connection with the conduct of business operations.
- 64. All documents evidencing use of the MARKS by any other person or entity in connection with the conduct of business operations, including but not limited to Steven A. Silvers; Stelor Productions, Inc; Stelor Productions, LLC; The Googles Children's Workshop, Inc.; Silvers Entertainment Group, Inc.; The Aurora Collection, Inc.; and Goo Investments LLC.
- 65. All documents referring or relating to, evidencing, reflecting, constituting, or comprising business plans concerning the MARKS or products or services bearing or otherwise associated with the MARKS, including but not limited to the business plans of Steven A. Silvers; Stelor Productions, Inc.; Stelor Productions, LLC; The Googles Children's Workshop, Inc.; Silvers Entertainment Group, Inc.; The Aurora Collection, Inc.; and Goo Investments LLC.

- 66. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning business plans concerning the MARKS or products or services bearing or otherwise associated with the MARKS, including but not limited to the business plans of Steven A. Silvers; Silvers Entertainment Group, Inc.; Stelor Productions, Inc.; Stelor Productions, LLC; The Googles Children's Workshop, Inc.; The Aurora Collection, Inc.; and Goo Investments LLC.
- 67. Documents sufficient to show your revenues, costs, and profits related to use and license of the MARKS by product or service, including by SKU (stock keeping unit).
- 68. All documents concerning projection of sales, revenue, or profits for any products or services bearing or otherwise associated with the MARKS.
- 69. All documents that refer directly or indirectly to Google Inc. and that discuss, reflect, evidence, or concern the rights you claim in this dispute.
- 70. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning Google Inc. and that discuss, reflect, evidence, or concern the rights you claim in this dispute
- 71. All documents concerning communications between you and Google Inc.
- 72. Documents sufficient to identify the names, all known addresses, and all known telephone numbers of actual or potential investors in Stelor Productions, Inc.; Stelor Productions, LLC; The Googles Children's Workshop, Inc.; The Aurora Collection, Inc.; Goo Investments LLC; or other businesses that have developed, marketed or delivered products or services that bear or are otherwise associated with the MARKS.
- 73. All documents concerning actual, proposed, or potential investors in, or an actual or potential investment in, the MARKS, products or services that bear or are otherwise associated with the MARKS, or businesses associated with the MARKS, including but not limited to

business plans, valuation of intellectual property assets, valuation of potential litigation, or valuation of potential settlement of litigation.

- 74. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning actual, proposed, or potential investors in, or an actual or potential investment in, the MARKS, products or services that bear or are otherwise associated with the MARKS, or businesses associated with the MARKS, including but not limited to communications concerning business plans, valuation of intellectual property assets, valuation of potential litigation, or valuation of potential settlement of litigation.
- 75. All documents concerning an actual, proposed, or potential investment in you or any entity that has or had a direct or indirect ownership interest in you, including but not limited to documents concerning promotions or offers of investment.
- 76. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning an actual, proposed, or potential investment in you or any entity that has or had a direct or indirect ownership interest in you, including but not limited to communications concerning promotions or offers of investment.
- 77. All documents concerning an actual, proposed, or potential investment in Stelor Productions, Inc. or any entity that has or had a direct or indirect ownership interest in Stelor Productions, Inc., including but not limited to documents concerning promotions or offers of investment.
- 78. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning an actual, proposed, or potential investment in Stelor Productions, Inc. or any entity that has or had a direct or indirect ownership interest in Stelor Productions, Inc., including but not limited to communications concerning promotions or offers of investment.

- 79. All documents concerning financial interests of any person or entity in any domain name disputes, trademark opposition or cancellation proceedings, or litigation to which Google Inc. is or has been a party.
- 80. All documents concerning financial transactions between you and any party claiming an interest in the MARKS or any party to domain name disputes, trademark opposition or cancellation proceedings, or litigation to which Google Inc. is or has been a party.
- 81. All documents concerning the business experience, business background, reputation, and criminal background (if any) of Steven A. Silvers, Steven Esrig, or of other officers or management personnel of The Googles Children's Workshop, Inc.; Silvers Entertainment Group, Inc.; Stelor Productions, Inc.; Stelor Productions, LLC; or The Aurora Collection.
- 82. All documents concerning your plans to develop or enforce rights in the MARKS.
- 83. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning your plans to develop or enforce rights in the MARKS.
- 84. All documents concerning communications to persons or entities other than Google in which you have made allegations (against any person or entity) of trademark infringement of the MARKS.
- 85. All documents filed in court or served in litigation to which you, Stelor Productions, Inc.; Steven Esrig; The Googles Children's Workshop, Inc.; Silvers Entertainment Group, Inc. or Steven A. Silvers is a party that concerns or may affect the rights to the MARKS or to enforce the MARKS.
- 86. All documents concerning litigation between you and Steven A. Silvers, Silvers Entertainment Group, Inc. or The Googles Children's Workshop, Inc., including but not limited to all documents filed with a court or served in litigation.

EXHIBIT C

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- 87. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications concerning litigation between you and Steven A. Silvers, Silvers Entertainment Group, Inc. or The Googles Children's Workshop, Inc.
- All documents concerning communications between you and Steven A. Silvers, Silvers Entertainment Group, Inc. or The Googles Children's Workshop, Inc. (or their attorneys or representatives).
- 89. All documents concerning The Aurora Collection.
- 90. All documents referring or relating to, evidencing, reflecting, constituting, or comprising communications with The Aurora Collection.
- 91. All documents reflecting or evidencing the fact alleged in paragraph 10 of the crossclaim that despite "efforts to preserve, expand and promote the GOOGLES IP, Silvers' venture made little impact in a marketplace crowded with children's materials from bigger and better financed providers."
- 92. All documents reflecting or evidencing the fact alleged in paragraph 10 of the crossclaim that "[a]n initial effort between Silvers and Aurora Collection, Inc. failed."
- 93. All documents reflecting or evidencing the fact alleged in paragraph 10 of the crossclaim that "Silvers was in no position to move forward alone, as he had many personal and business hurdles to overcome," including all documents reflecting or evidencing "a lack of capital, a lack of connections, a lack of experience, a lack of access to financing, an increasingly adverse relationship with Aurora, and negative aspects of Silvers' background that made him unsuited to serve as figurehead or spokesman for an enterprise aimed at providing wholesome and enriching entertainment to an audience of impressionable children."
- 94. All documents reflecting or evidencing the fact alleged in paragraph 11 of the crossclaim that "Stelor was formed to develop Silvers' concept into a reality."

- 95. All documents reflecting or evidencing the fact alleged in paragraph 13 of the crossclaim that "Stelor has spent millions of dollars, and its principals and employees have devoted themselves tirelessly to making Stelor and the 'Googles' successful and profitable, both for themselves and for the benefit of Silvers."
- 96. All documents reflecting or evidencing the fact alleged in paragraph 14 of the crossclaim that Silvers "held himself out as a Stelor representative at crucial industry trade shows."
- 97. All documents reflecting or evidencing the fact alleged in paragraph 14 of the crossclaim that Silvers "threatened to communicate directly with the trade and press concerning the GOOGLES IP."
- 98. All documents reflecting or evidencing the fact alleged in paragraph 14 of the crossclaim that Silvers "withheld information vital to Stelor's ability to carry out the business of transforming the basic Googles ideas into a thriving and profitable business and denied it access to Googles domain names."
- 99. All documents reflecting or evidencing the fact alleged in paragraph 14 of the crossclaim that Silvers "subverted Stelor's intellectual property rights by diverting communications from the USPTO from Stelor to himself."
- 100. All documents reflecting or evidencing the fact alleged in paragraph 14 of the crossclaim that Silvers "interfered with litigation undertaken by Stelor against third parties."
- 101. All documents reflecting or evidencing the fact alleged in paragraph 19 of the crossclaim that Silvers failed to cooperate in pending and future trademark and domain name dispute proceedings, failed to provide evidence of paid insurance premiums, and "schemed to undo Stelor's business activities and steal its work."
- 102. All documents concerning the location, possession, and maintenance of the other documents requested in this set of document requests.

Dated: April 5, 2006

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Andrew P. Bridges Jennifer Golinveaux WINSTON & STRAWN LLP 101 California Street, Suite 3900 San Francisco, California 94111 Phone: (415) 591-1000 Fax: (415) 591-1400 Attorneys for Defendant and Counterclaimant GOOGLE INC.

1	PROOF OF SERVICE
2	I am a resident of the State of California, over the age of eighteen years, and
3	I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Winston & Strawn LLP, 101 California Street, San Francisco, CA 94111-5894. On April 5, 2006, I served the within documents:
4 5	GOOGLE'S FIRST SET OF DOCUMENT REQUESTS TO STELOR PRODUCTIONS, LLC
6	I sent such document from facsimile machine 415-591-1400. I certify that said transmission was completed and that all pages were received and that a superior that a received and that a superior that a received and that a superior that a s
7 8 9	that a report was generated by facsimile machine 415-591-1400 which confirms said transmission and receipt. I, thereafter, mailed a copy to the interested party(ies) in this action by placing a true copy thereof enclosed in sealed envelop(s) addressed to the parties listed below.
10	by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, addressed as set forth below.
11 12	by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
13 14	by sending it via Overnight mail.
 15 16 17 18 19 20 21 22 23 24 25 26 27 28 	Harley S. Tropin Kenneth R. Hartmann Gail A. McQuilkin Sozyak Tropin & Throckmorton, P.A. 2525 Ponce de Leon, 9th Floor Miami, Florida 33134 Fax: 305-372-3508 Adam T. Rabin Dimond Kaplan & Rothstein, P.A. 525 S. Flagler Drive, Trump Plaza - Suite 200 West Palm Beach, Florida 33401 Fax: 561-671-1951 I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than on day after the date of deposit for mailing in affidavit. I declare that I am employed in the office of a member of the bar of this court whose direction the service was made. Executed on April 5, 2006, at San Francisco, California.
	Theresa Unpang-Lozada
	SF:115530.1 EXHIBIT C

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