

Nov 1 2005

CLARENCE MADDOX  
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S. D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 05-80387 CIV RYSKAMP/VITUNIC

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,Counterdefendants.  
\_\_\_\_\_**COUNTERDEFENDANTS' MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND TO COUNTERCLAIM AND MOTION TO BIFURCATE**

Counterdefendants, STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC. ("Stelor") and STEVEN ESRIG ("Esrig") (collectively, "Stelor Defendants"), by and through their undersigned attorneys, hereby files this Motion for enlargement of time to respond to the Counterclaim and Motion to Bifurcate ("Motion") filed by GOOGLE INC. and alleges as follows:

1. Stelor's preparation of responses to the Counterclaim and Motion has been delayed by Hurricane Wilma. In fact, undersigned counsel's offices were closed until today as a

BURLINGTON • WEIL • SCHWIEP • KAPLAN (&) BLONSKY, P.A.

OFFICE IN THE GROVE PENTHOUSE 2699 SOUTH BAYSHORE DRIVE MIAMI, FLORIDA 33133

T: 305.858.2900 F: 305.858.5261

EMAIL: INFO@BWSKB.COM WWW.BWSKB.COM

result of roof damage and loss of power, with counsel unable to access files in the interim.

2. Counsel is in the process of prioritizing work, and addressing numerous matters with pending deadlines.

3. Responses will be completed as promptly as possible, but Stelor respectfully requests an additional ten-days, up to and including November 11, 2005, to complete the process.

4. This enlargement is not requested for purposes of delay, and will not unduly prejudice Google. Indeed, the court has been closed throughout this period.

5. Undersigned counsel spoke with counsel for Google by telephone last week, who advised that Google would work with Stelor on the pending deadlines. Counsel for Stelor specifically advised counsel for Google by email today of the requested relief, and has not yet heard back.

WHEREFORE, Stelor respectfully requests entry of an order enlarging by 10 days the time for Stelor to respond to the Counterclaim and Motion.

RESPECTFULLY SUBMITTED,

BURLINGTON, WEIL, SCHWIEP,  
KAPLAN & BLONSKY, P.A.  
Attorneys for Stelor Productions, LLC  
2699 South Bayshore Drive, Penthouse  
Miami, Florida 33133  
Tel: 305-858-2900  
Fax: 305-858-5261  
Email: [kkaplan@bwskb.com](mailto:kkaplan@bwskb.com)

By: /s/ Kevin C. Kaplan  
Kevin C. Kaplan  
Florida Bar No. 933848  
David J. Zack  
Florida Bar No. 641685

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was served via U.S. mail on this 31<sup>st</sup> day of October, 2005 upon the following:

Adam T. Rabin, Esq.  
DIMOND, KAPLAN &  
ROTHSTEIN, P.A.  
Trump Plaza  
525 S. Flagler Drive, Suite 200  
West Palm Beach, Florida 33401  
Jan Douglas Atlas  
ADORNO & YOSS LLP  
350 East Las Olas Boulevard  
Suite 1700  
Fort Lauderdale, Florida 33301

Kenneth R. Hartmann, Esq.  
Gail M. McQuilkin, Esq.  
KOZYAK TROPIN &  
THROCKMORTON, P.A.  
2525 Ponce de Leon Blvd., 9<sup>th</sup> Floor  
Coral Gables, Florida 33134  
Andrew P. Bridges  
WINSTON & STRAWN LLP  
101 California Street, Suite 3900  
San Francisco, California 94111

/s/ Kevin C. Kaplan  
Kevin C. Kaplan

UNITED STATES DISTRICT COURT  
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Corporation; STELOR PRODUCTIONS, LLC, a  
Delaware limited liability company,

Counterdefendants.

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**PROPOSED ORDER GRANTING MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO  
COUNTERCLAIM AND MOTION TO BIFURCATE**

This matter came before the Court on Counterdefendants, STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC. (“Stelor”) and STEVEN ESRIG (“Esrig”) (collectively, “Stelor Defendants”), Motion for Enlargement of Time to Respond to Google Inc.’s Counterclaim and Motion to Bifurcate. Having reviewed the Motion, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Motion is hereby GRANTED.

2. The Stelor Defendants shall have up to and including November 11, 2005 to serve their responses to the Counterclaim and Motion to Bifurcate.

DONE and ORDERED in Chambers at West Palm Beach, Florida, this \_\_\_\_ day of November, 2005.

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UNITED STATES DISTRICT JUDGE

cc: Jan Douglas Atlas, Esq.  
Andrew P. Bridges, Esq.  
Kenneth R. Hartmann, Esq.  
Kevin C. Kaplan, Esq.  
Adam T. Rabin, Esq.