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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Palm Beach Division

STEVEN A. SILVERS, an individual,
Plaintiff,

v.

CASE NO. 05-80387-CIV

GOOGLE, INC., a Delaware corporation,
Defendant.

Ryskamp/Vitunac

GOOGLE, INC., a Delaware corporation,
Counter-Claimant,

v.

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.

STELOR PRODUCTIONS, LLC; STELOR
PRODUCTIONS, INC.; and STEVEN ESRIG,
Cross-Plaintiffs,

v.

STEVEN A. SILVERS,
Cross-Defendant.

LOCAL RULE 16.1(B) JOINT SCHEDULING REPORT ON PHASE ONE

Plaintiff, Steven A. Silvers, Defendant/Counter-Claimant, Google, Inc. and Counter-Defendants/Cross-Plaintiffs, Stelor Productions, LLC, Stelor Productions, Inc. and Steven Esrig, submit this Joint Scheduling Report pursuant to the Court's November 1, 2005 Order, Order dated February 6, 2006 Granting Bifurcation, Order dated February 27, 2006 Denying Motion To Dismiss Cross-Claim, and Rule 16.1(B) of the Local Rules. Counsel for the parties met telephonically on March 10, 2006, and as a result of this meeting and conversation, report as follows:

1. Likelihood of Settlement.

There is no likelihood of settlement at this time.

2. Likelihood of Appearance of Additional Parties.

The parties consider the appearance of additional parties to be unlikely in this phase of the litigation.

3. Proposed Limits on Time.

- (a) To join other parties and to amend pleadings: N/A.
- (b) To file and hear motions: the parties propose that all pretrial motions and memorandums of law, except for summary judgment motions, be filed before the date of the final pretrial conference.
- (c) To complete non-expert discovery:
 - (1) Silvers and Stelor/Esrig: June 30, 2006 (2) Google, Inc.: July 31, 2006
- (d) To disclose experts:
 - (1) Silvers and Stelor/Esrig: June 30, 2006 (2) Google, Inc.: July 31, 2006
- (e) To disclose rebuttal experts:
 - (1) Silvers and Stelor/Esrig: July 15, 2006 (2) Google, Inc.: August 22, 2006
- (f) To complete expert discovery:
 - (1) Silvers and Stelor/Esrig: July 31, 2006 (2) Google, Inc.: September 15, 2006
- (g) To file case-dispositive motions:
 - (1) Silvers and Stelor/Esrig: Aug. 14, 2006 (2) Google, Inc.: Sept. 29, 2006
- (h) The parties agree to cooperate in extending discovery deadlines if, despite reasonable diligence, additional time is needed to complete discovery.

4. Formulation and Simplification of Issues.

Counsel foresee working together to formulate and simplify the issues.

5. Necessity/Desirability of Amending Pleadings.

The parties do not anticipate amending the pleadings in this phase of the litigation.

6. Admissions of Fact and Documents.

The parties agree to work together in good faith to stipulate to the admissibility of facts and documents.

7. Avoidance of Unnecessary Proof/Cumulative Evidence.

The parties agree to work together in good faith to avoid using unnecessary proof or cumulative evidence.

8. Referral to Magistrate Judge.

The parties agree that all pre-trial discovery matters, other than those that involve admissibility of evidence at trial, may be referred to Magistrate Judge for determination.

9. Time for Trial.

The parties believe that the case can be tried before a jury in three (3) days (Silvers and Stelor/Esrig) or four (4) days (Google, Inc.). Certain pretrial rulings may alter the time, or eliminate the need, for trial.

10. Pretrial Dates.

The parties propose to file their Joint Pretrial Stipulation 10 days before trial. The parties request that a Final Pretrial Conference be held 5 days before trial. Silvers and Stelor/Esrig request that this case be set on the Court's two-week trial calendar beginning September 4, 2006. Google, Inc. requests that Phase One of this case be set for trial on November 6, 2006, or soon thereafter, to allow time for likely dispositive motions after the September 29, 2006 filing date.

11. Additional Information.

The parties are not aware of any additional information that may be helpful to the Court in setting this case for status or pretrial conference.

12. Bench/Jury Trial.

The parties have requested a jury trial on all issues so triable.

13. Joint Proposed Scheduling Order.

The parties' Joint Proposed Scheduling Order is attached hereto.

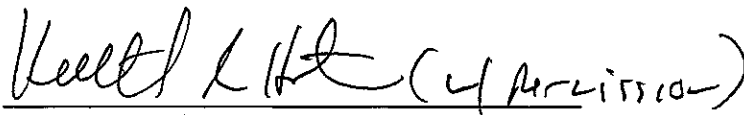
Respectfully submitted this 22nd day of MARCH, 2006.

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PROPOSED SCHEDULING ORDER

THIS CAUSE came before the Court upon the parties' Joint Scheduling Report. It is hereby
ORDERED AND ADJUDGED that the parties shall adhere to the following time schedule
for Phase 1 of this bifurcated case:

DISCOVERY

1. The parties shall complete factual discovery by _____, 2006.
2. All non-expert discovery, including depositions, will be completed by
_____, 2006.

3. The parties shall designate and exchange reports of expert witnesses, as provided in Local Rule 16.1(K), by _____, 2006.

4. The parties will designate and exchange reports of rebuttal expert witnesses, as provided in Local Rule 16.1(K), by _____, 2006.

5. All expert discovery, including depositions, shall be completed by _____, 2006.

PRE-TRIAL

6. The parties do not foresee the need for a preliminary pretrial conference.

7. The Final Pretrial Conference has been set for _____, 2006.

8. The cutoff date to join other parties and to amend pleadings is _____, 2006.

9. All pre-trial motions, except for summary judgment motions, shall be filed at the time of the pretrial conference.

10. All summary judgment motions shall be filed by _____, 2006.

11. All motions shall be heard no later than the date of the final pretrial conference.

12. All pre-trial discovery matters may be referred to Magistrate Judge Vitunac for entry of either a report and recommendation or, where appropriate, an order.

TRIAL

13. This cause is set for trial during the one / two week period commencing on _____, 2006.

KENNETH RYSKAMP
U.S. District Judge

Copies furnished to:

All counsel of record
3339/102/256810.2