

May 8 2006

CLARENCE MADDOX  
CLERK U.S. DIST. CT.  
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.  
\_\_\_\_\_**STELOR LLC'S MOTION FOR ENLARGEMENT TO RESPOND  
TO GOOGLE INC.'S FIRST SET OF DOCUMENT REQUESTS**

Counterdefendant, STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC. ("Stelor"), by and through its undersigned attorneys, hereby files this Motion for Enlargement of Time to respond to Google Inc.'s First Set of Document Requests:

1. Google sought and obtained an order bifurcating *discovery* and trial in this action, which limits the first phase of the case to the "threshold issue of ownership" of the trademarks at issue. Nevertheless, Google has served a voluminous request for production of documents from

BURLINGTON • SCHWIEP • KAPLAN &amp; 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@BSKBLAW.COM WWW.BSKBLAW.COM

Stelor, seeking in excess of **100** categories of documents, the majority of which appear to have no conceivable connection to that limited threshold issue (the exclusive subject of the first phase of the case).

2. Stelor is attempting to ferret through the items of the request and determine which categories in fact relate to the threshold issue. Stelor recognizes the pending discovery deadlines, and is committed to responding as promptly as possible.

3. Given the nature of the requests, however, Stelor has not yet been able to complete the process.

4. Accordingly, Stelor requests a 20-day enlargement of time to respond to the request for production.

5. Stelor has advised counsel for Google of the requested enlargement, as well as the issues regarding the request's scope, but Counsel for Google has refused to agree to the request.

WHEREFORE, Stelor respectfully requests entry of an order enlarging by ten days, up to and including May 29, 2006, the time for Stelor to respond Google Inc.'s First Request for Production to Stelor.

BURLINGTON, 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  
8<sup>th</sup> day of May, 2006 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

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STELOR PRODUCTIONS, INC., a Delaware  
Corporation; STELOR PRODUCTIONS, LLC, a  
Delaware limited liability company,

Counterdefendants.

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**PROPOSED ORDER GRANTING STELOR LLC'S MOTION  
FOR ENLARGEMENT TO RESPOND TO GOOGLE INC.'S  
FIRST SET OF DOCUMENT REQUESTS**

This matter came before the Court on Counterdefendants, STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC. ("Stelor"), Motion for Enlargement of Time to Respond to Google Inc.'s First Set of Document Requests, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Motion is hereby GRANTED.

2. Stelor shall have up to and including May 28, 2006 to respond to Google Inc.'s First Set of Document Requests.

DONE and ORDERED in Chambers at West Palm Beach, Florida, this \_\_\_\_ day of May, 2006.

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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.