

FILED by ELECTRONIC	D.J.	D.C.
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Jun 5 2006		
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Palm Beach Division

STEVEN A. SILVERS, an individual.
Plaintiff,

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

v.

GOOGLE INC., a Delaware corporation,
Defendant.

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.

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

The law firms of Kozyak Tropin & Throckmorton, PA (“KTT”), and Dimond Kaplan & Rothstein (“DKR”), counsel to Plaintiff/Cross-Defendant, Steven A. Silvers (“Silvers”), request an Order giving KTT and DKR the authority to withdraw as counsel of record for Silvers, and state:

1. KTT and DKR have developed irreconcilable differences with Silvers that has compromised KTT and DKR’s ability to effectively represent Silvers.
2. Counsel for defendant Google and counter-defendant Stelor have been advised of undersigned’s intention to withdraw and has been served with a copy of this motion via electronic mail and U.S. Mail.
3. The undersigned request that the Court allow Silvers thirty (30) days to obtain new counsel, or notify the Court that he will proceed *pro se*. Further, we request that the Court

grant Silvers an extension of time on all discovery and pre-trial deadlines in Phase I of this case to permit him to obtain new counsel. Until further notice, all pleadings, orders and other materials should be served on Silvers at the following address:

Steven A. Silvers
8983 Okeechobee Blvd., Suite 202
PMB 203
West Palm Beach, Florida 33411
E-mail: gewrue@hotmail.com
Phone: 954-445-6788 / Fax: 561-784-9959

WHEREFORE, Kozyak, Tropin & Throckmorton, P.A. and Dimond Kaplan & Rothstein respectfully request that this Court enter an Order allowing them to withdraw as counsel of record for plaintiff Steven A. Silvers, and relieve them from any further responsibilities and/or obligations in this matter, and to allow Silvers thirty (30) days to obtain new counsel or proceed *pro se*, and grant Silvers a thirty (30) day extension of time to respond to discovery and comply with all other pre-trial deadlines in Phase I of this case.

Respectfully submitted,



Adam T. Rabin (Fla. Bar #985635)
DIMOND KAPLAN & ROTHSTEIN, P.A.
525 S. Flagler Drive, Trump Plaza, Suite 200
West Palm Beach, Florida 33401
T: 561-671-2110 / F: 561-671-1951

s/ Gail A. McQuilkin

Kenneth R. Hartmann (Fla. Bar #664286)
Gail A. McQuilkin (Fla. Bar #969338)
KOZYAK TROPIN & THROCKMORTON, P.A.
2525 Ponce de Leon, 9th Floor
Miami, Florida 33134
T: 305-372-1800 / F: 305-372-3508

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by E-mail and U.S. mail on this 5th day of June, 2006 upon:

Jan Douglas Atlas
Adorno & Yoss, LLP
350 East Las Olas Blvd., Suite 1700
Fort Lauderdale, FL 33301-4217
E-mail: jatlas@adorno.com

Andrew P. Bridges
Winston & Strawn, LLP
101 California Street, Suite 3900
San Francisco, CA 94111
E-mail: abridges@winston.com

Kevin C. Kaplan
Burlington Weil Schwiep Kaplan & Blonsky, PA
2699 S. Bayshore Drive, Penthouse A
Miami, FL 33133
E-mail: kkaplan@bwskb.com

Steven A. Silvers
8983 Okeechobee Blvd., Suite 202
PMB 203
West Palm Beach, FL 33411
E-mail: gewrue@hotmail.com

s/ Gail A. McQuilkin

3339/102/265932.1

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an individual,
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ORDER
ON MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

THIS CAUSE having come on before the Court on Motion to Withdraw as Counsel for Plaintiff, and the Court having considered same, it is

ORDERED that said Motion is **GRANTED** as follows:

1. The law firms of Kozyak Tropin & Throckmorton and Dimond Kaplan & Rothstein shall have no further responsibility in connection with this case.

2. All pleadings in this litigation shall be served upon Plaintiff Steven A. Silvers:

Steven A. Silvers
8983 Okeechobee Blvd., Suite 202 - PMB 203
West Palm Beach, Florida 33411
Email: gewrue@hotmail.com
Phone: 954-445-6788 / Fax: 561-784-9959

3. Silvers shall have thirty (30) days from the date of this Order to obtain new counsel or advise the Court that he is proceeding *pro se*.

4. Further, Silvers is granted a thirty (30) day extension of time on all pre-trial deadlines in Phase 1 of this matter.

DONE and ORDERED in Chambers in Palm Beach County, Florida, this _____ day of _____, 2006.

UNITED STATES DISTRICT COURT JUDGE

c: All Counsel of Record