



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 05-80393 CIV HURLEY/HOPKINS

STELOR PRODUCTIONS, L.L.C., a
Delaware limited liability company,
f/k/a STELOR PRODUCTIONS, INC.,

Plaintiff,

vs.

STEVEN A. SILVERS, a Florida resident,

Defendant.

**PLAINTIFF'S RESPONSE TO URGENT REQUEST FOR CLARIFICATION
OF ORDER GRANTING TEMPORARY RESTRAINING ORDER**

Plaintiff Stelor Productions, LLC ("Stelor"), by and through undersigned counsel, hereby responds to Defendant's request for clarification as follows:

Defendant Steven A. Silvers ("Silvers") can easily comply with the relief ordered. In fact, Plaintiff has already been in communication with Silvers' counsel, and has provided by e-mail the exact written instructions that Silvers should provide to both GoDaddy.com and Verio, Inc. in order to comply with the portion of the Order at issue. A true and correct copy of the e-mail is attached hereto. Silvers' counsel apparently filed the request for clarification prior to conferring with counsel for Stelor, and the exchange of these instructions.

Accordingly, the request should be denied. Defendant should simply send the requested email to GoDaddy.com and Verio.

Respectfully submitted,

BURLINGTON, WEIL, SCHWIEP,
KAPLAN & BLONSKY, P.A.
Attorneys for Plaintiff
Office in the Grove, Penthouse A

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Tel: 305-858-2900
Fax: 305-858-5261
Email address: 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 is being served via Telefax and
U.S. mail on this 10th day of June, 2005 upon the following:

Adam T. Rabin, Esq.
DIMOND, KAPLAN &
ROTHSTEIN, P.A.
Suite 708
200 S.E. First Street
Miami, Florida 33131

Kenneth R. Hartmann, Esq.
Gail M. McQuilkin, Esq.
KOZYAK TROPIN &
THROCKMORTON, P.A.
2525 Ponce de Leon Blvd., 9th Floor
Coral Gables, Florida 33134

/s/ Kevin C. Kaplan
Kevin C. Kaplan

Kevin C. Kaplan

From: Kevin C. Kaplan
Sent: Thursday, June 09, 2005 5:44 PM
To: 'krh@kttlaw.com'
Subject: FW: stelor

Ken,

Attached is the language we request you immediately email to Go Daddy and Verio at the addresses we provide. Thanks.

INSTRUCTIONS TO GO DADDY

As we discussed, please send the following email to Pam Holland (pholland@godaddy.com) and Christine Jones (legal@godaddy.com), with copies to me (kkaplan@bwskb.com) and Michael Fox (mfox@verio.net):

We are counsel for Defendant Steven Silvers, the registrant of GOOGLES.COM (and the additional domain names listed below, totaling 78 names). Pursuant to a court order dated June 9, 2005, we authorize and instruct Go Daddy immediately to change the DNS for these 78 domain names to designate Verio Servers NS1.SECURE.NET and NS2.SECURE.NET and to take all other action necessary to cause the traffic to GOOGLES.COM and the other domain names to be directed to the Verio Servers controlled by Stelor Productions under the account name of GOOGMPS. After this change is made, the WHOIS for the 78 domain names should remain locked pending further order from the court or joint instruction from the parties. The domain names are as follows:

GOOBEANIES.COM, GOOBEANIES.NET, GOOBOP.COM, GOOGLEMAIL.NET,
GOOGLES.BIZ, GOOGLES.COM, GOOGLES.INFO, GOOGLES.NAME, GOOGLES.NET,
GOOGLES.US, GOOGLES.WS, GOOGLESADVENTURE.COM,
GOOGLESADVENTURES.COM, GOOGLESFROMGOO.COM,
GOOGLESFROMGOO.INFO, GOOGLESFROMGOO.NET,
GOOGLESMAIL.COM, GOOGLESMAIL.NET, GOOGLESMANIA.COM,
GOOGLESMUSIC.COM, GOOHOP.COM, GOOKID.COM,
GOOKIDS.COM, GOOKIDS.NET, GOOKIDSMAIL.COM, GOOKIDSMAIL.NET,
GOOKIDSRGOORIFFIC.COM, GOOKIDZ.COM,
GOOKIDZ.NET, GOOKIDZMAIL.COM, GOOKIDZMAIL.NET, GOOMAIL.NET,
GOOMANIA.COM, GOOMUSIC.COM, GOOPETS.COM, GOOPETZ.COM,
GOORIFFICENTERTAINMENT.COM, GOORIFFICENTERTAINMENT.NET,
GOOSHIP.COM,
GOOSHOES.COM, GOOSTUFF.COM, GOOTOPIA.COM, GOOTOPIA.BIZ,
GOOTOPIA.INFO, GOOTOYS.COM,
GOOTOYS.NET, GOOTUNES.COM, GOOWARE.COM, GOOWEAR.COM,
OOGLESADVENTURE.COM, OOGLESFROMGOO.COM, OOGLESFROMGOO.NET,

OOGOOS.COM, OOGOOS.NET, PLANETGOO.NET,
PLANETOFGOO.COM, PLANETOFGOO.NET, THEGOOCREW.COM,
THEGOOGLES.COM, THEGOOGLESADVENTURE.COM,
THEGOOGLESADVENTURES.COM, THEGOOGLESFROMGOO.COM,
THEGOOGLESFROMGOO.INFO, THEGOOGLESFROMGOO.NET,
THEGOOGLESMAIL.COM, THEGOOGLESMAIL.NET, THEGOOKIDSMAIL.COM,
THEGOOKIDSMAIL.NET, THEGOOKIDZMAIL.COM, THEGOOKIDZMAIL.NET,
THEOOGLES.COM, THEOOGLES.NET,
THEOOGLESFROMGOO.COM, THEOOGLESFROMGOO.NET, THEOOGOOS.COM,
THEOOGOOS.NET, THEPLANETOFGOO.COM, THEPLANETOFGOO.NET

We are also sending instructions to Verio, and will copy you on those emails.

INSTRUCTIONS TO VERIO

Please send the following email to Verio, Inc., addressed to Michael Fox (mfox@verio.net) and Chris Wienke (cwienke@verio.net), with copies to me (kkaplan@bwskb.com), Christine Jones (legal@godaddy.com), and Pam Holland (pholland@godaddy.com):

We are counsel for Defendant Steven Silvers, the registrant of GOOGLES.COM (and the additional domain names listed below, totaling 78 names). Pursuant to a court order dated June 9, 2005, we have authorized and instructed Go Daddy immediately to change the DNS for the 78 domain names to designate Verio Servers NS1.SECURE.NET and NS2.SECURE.NET and to take all other action necessary to cause the traffic to GOOGLES.COM and the other domain names to be directed to the Verio Servers controlled by Stelor Productions under the account name of GOOGMPS.

We further authorize and instruct Verio, Inc. to take all action necessary to cause the traffic to GOOGLES.COM and the other 78 domain names to be directed to the Verio Servers controlled by Stelor Productions under the account name of GOOGMPS. After this change is made, the WHOIS for the 78 domain names should remain locked pending further order from the court or joint instruction from the parties. The domain names are as follows:

GOOBEANIES.COM, GOOBEANIES.NET, GOOBOP.COM, GOOGLEMAIL.NET,
GOOGLES.BIZ, GOOGLES.COM, GOOGLES.INFO, GOOGLES.NAME, GOOGLES.NET,
GOOGLES.US, GOOGLES.WS, GOOGLESADVENTURE.COM,
GOOGLESADVENTURES.COM, GOOGLESFROMGOO.COM,
GOOGLESFROMGOO.INFO, GOOGLESFROMGOO.NET,
GOOGLESMAIL.COM, GOOGLESMAIL.NET, GOOGLESMANIA.COM,
GOOGLESMUSIC.COM, GOOHOP.COM, GOOKID.COM,
GOOKIDS.COM, GOOKIDS.NET, GOOKIDSMAIL.COM, GOOKIDSMAIL.NET,
GOOKIDSRGOORIFFIC.COM, GOOKIDZ.COM,
GOOKIDZ.NET, GOOKIDZMAIL.COM, GOOKIDZMAIL.NET, GOOMAIL.NET,
GOOMANIA.COM, GOOMUSIC.COM, GOOPETS.COM, GOOPETZ.COM,
GOORIFFICENTERTAINMENT.COM, GOORIFFICENTERTAINMENT.NET,
GOOSHIP.COM,
GOOSHOES.COM, GOOSTUFF.COM, GOOTOPIA.COM, GOOTOPIA.BIZ,

GOOTOPIA.INFO, GOOTOYS.COM,
GOOTOYS.NET, GOOTUNES.COM, GOOWARE.COM, GOOWEAR.COM,
OOGLESADVENTURE.COM, OOGLESFROMGOO.COM, OOGLESFROMGOO.NET,
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PLANETOFGOO.COM, PLANETOFGOO.NET, THEGOOCREW.COM,
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THEOOGOOS.NET, THEPLANETOFGOO.COM, THEPLANETOFGOO.NET

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