

Aug 19 2005

CLARENCE MADDOX
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMIUNITED 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 MOTION FOR ENLARGEMENT OF TIME
TO FILE AMENDED COMPLAINT**

Plaintiff Stelor Productions, LLC ("Stelor"), by and through undersigned counsel, hereby moves on the following grounds for an enlargement of time to file its amended complaint:

1. Plaintiff is in the process of preparing its amended complaint and supplementary evidentiary submissions in accordance with the Court's Order Granting Without Prejudice Defendant's Motion to Dismiss ("Order").
2. Pursuant to that Order, the amended complaint and evidentiary submissions are due to be filed on Monday, August 22, 2005.
3. Plaintiff, however, requires a few additional days to complete the amended complaint and submissions, and respectfully requests a one-week enlargement of time. As cause for the requested enlargement, health concerns of Stelor's CEO have limited his availability, and the assembly of the additional information needed for the amendment is not yet completed. Stelor requires the additional time to complete the process, and ensure that the amended complaint is filed with accurate and complete information.

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4. The enlargement is not requested for purposes of delay, and will not prejudice the Defendant.

5. Undersigned counsel has advised opposing counsel of the requested enlargement, but they do not agree.

WHEREFORE, Plaintiff respectfully requests an enlargement of time up to and including August 29, 2005, to file its amended complaint and supplementary evidentiary submissions.

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By: /s/ Kevin C. Kaplan
Kevin C. Kaplan
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David J. Zack
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served via electronic mail and U.S. mail on this 19th day of August, 2005 upon the following:

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/s/ Kevin C. Kaplan
Kevin C. Kaplan

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 05-80393-Civ-Hurley/Hopkins

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

Plaintiff,

vs.

STEVEN A. SILVERS, a Florida resident,

Defendant.

**PROPOSED ORDER GRANTING PLAINTIFF'S MOTION FOR
ENLARGEMENT OF TIME TO FILE AMENDED COMPLAINT**

This matter came before the Court on Plaintiff STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC.'s ("Stelor") Motion for Enlargement of Time to File Amended Complaint. 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. Plaintiff shall have up to and including August 29, 2005 to file its amended complaint and supplementary evidentiary submissions pursuant to the Court's Order Granting Defendant's Motion to Dismiss Without Prejudice.

DONE and ORDERED in Chambers at West Palm Beach, Florida, this ____ day of August, 2005.

UNITED STATES DISTRICT JUDGE

cc: Kenneth R. Hartmann, Esq.
Kevin C. Kaplan, Esq.
Adam T. Rabin, Esq.