

Sep 6 2005

CLARENCE MADDOX
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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 RESPOND TO DISCOVERY REQUESTS**

Plaintiff Stelor Productions, LLC ("Stelor"), by and through undersigned counsel, hereby moves on the following grounds for an enlargement of time to response to written discovery requests served by Defendant Steven Silvers ("Silvers"):

1. Defendant Silvers served written discovery requests, including interrogatories and a request for production.
2. The requests are voluminous, requesting detailed information regarding virtually every aspect of Plaintiff's business, during a multi-year period. Plaintiff is attempting to analyze the responsive information, in order to determine what reasonably can and should be produced, or alternatively objected to.
3. Counsel for Silvers had agreed to an initial 20 day enlargement of time. Plaintiff, however, requests an additional 20 days to complete the process.
4. Plaintiff has advised counsel for Silvers of the requested enlargement, but has not yet been advised of counsel's position in response.

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5. The enlargement is not requested for purposes of delay, and would not unduly prejudice Defendant.

WHEREFORE, Plaintiff respectfully requests an enlargement of time up to and including September 26, 2005 to respond (including by objections) to Silver's written discovery requests.

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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 electronic mail and U.S. mail on this 6th day of September, 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

STELOR PRODUCTIONS, L.L.C., a
Delaware limited liability company,
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Plaintiff,

vs.

STEVEN A. SILVERS, a Florida resident,

Defendant.

**PROPOSED ORDER GRANTING PLAINTIFF'S MOTION FOR
ENLARGEMENT OF TIME TO RESPOND TO DISCOVERY REQUESTS**

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 Respond to Discovery Requests. 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 September 26, 2005 to respond to Silver's written discovery requests.

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

UNITED STATES DISTRICT JUDGE

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