

Nov 16 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 AGREED MOTION FOR ENLARGEMENT OF TIME TO
RESPOND TO DEFENDANT'S MOTION FOR ATTORNEYS FEES
AND EXPENSES AND ACCOMPANYING BILL OF COSTS**

Plaintiff Stelor Productions, LLC ("Stelor"), by and through undersigned counsel, hereby moves on the following grounds for an enlargement of time to respond to Defendant's motion for attorneys' fees and expenses, and motion for Rule 11 Sanctions [DE# 82] and accompanying bill of costs [DE #83], which have been referred to Magistrate Judge Hopkins for a report and recommendation:

1. Plaintiff is in the process of preparing its response to the motion, but requires a few additional days to complete the process.
2. The motion seeks hundreds of thousands of dollars in fees, based on a dismissal for lack of jurisdiction. Given the importance of the issue, and the need to address the voluminous attachments to the motion, including by affidavits, the additional time is required.
3. In addition, counsel has been engaged in the preparation of various papers relating to the ongoing dispute between these parties, which now continues before the Honorable Judge

BURLINGTON • WEIL • SCHWIEP • KAPLAN & 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@BWSKB.COM WWW.BWSKB.COM

Ryskamp, in Case No. 05-80387, styled *Silvers v. Google Inc.*, in which Stelor was joined as a counterclaim defendant.

4. Accordingly, Stelor respectfully requests a one-week enlargement of time, up to and including November 23, 2005.

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

6. Counsel for defendant has been advised of and agrees to the requested enlargement.

WHEREFORE, Plaintiff respectfully requests an enlargement of time up to and including November 23, 2005, to serve its response to the fees motion and bill of costs.

BURLINGTON, WEIL, SCHWIEP,
KAPLAN & BLONSKY, P.A.
Attorneys for Plaintiff
Office in the Grove, Penthouse A
2699 South Bayshore Drive
Miami, Florida 33133
Tel: 305-858-2900
Fax: 305-858-5261
Email: 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 electronic mail and U.S. mail on this 16th day of November 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

UNITED STATES DISTRICT COURT
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Delaware limited liability company,
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Plaintiff,

vs.

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Defendant.

**ORDER ON PLAINTIFF'S AGREED MOTION FOR ENLARGEMENT OF TIME TO
RESPOND TO DEFENDANT'S MOTION FOR ATTORNEYS FEES
AND EXPENSES AND ACCOMPANYING BILL OF COSTS**

This matter came before the Court on Plaintiff STELOR PRODUCTIONS, L.L.C., f/k/a STELOR PRODUCTIONS, INC. ("Stelor") Agreed Motion for Enlargement of Time to Respond to Defendant's Motion For Attorneys Fees and Expenses [DE #82] and Accompanying Bill of Costs [DE #83] and the Court 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 November 23, 2005, to serve its response to the fee motion and bill of costs.

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

UNITED STATES DISTRICT JUDGE

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