

Exhibit A

The Plaintiff/Counter-Defendant objects to the Defendant/Counter-Plaintiff's Production Request and Interrogatories.

Production Requests

More specifically as to each request the Plaintiff raises the following objections:

As to production request 1, the request seeks all documents that show Stelor owns the Googles, Oogle, Oggle and Iggle trademarks. Plaintiff/Counter-Defendant provided to Defendant/Counter-Plaintiff the USPTO records of assignment evidencing that Stelor owns the aforementioned trademarks. Additional production is irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production requests 2 & 3, the request seeks Stelor's business plans, marketing plans. Defendant/Counter-Plaintiff is in direct competition with Stelor and Stelor's business and marketing plans are sensitive and confidential information. This request is irrelevant, unduly burdensome and outside the scope of permissible discovery.

As to production request 5, the request seeks all prospectuses, private placement memorandums and other documents soliciting investments in Stelor. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This request is irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production requests 9-10, 36, the requests seek communications with Steven A. Silvers, the creator of the Googles intellectual property or his counsel. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are irrelevant, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to production requests 33-34, 64, 65 the requests seek all contracts, agreements settlement agreements and releases between or among Steven A. Esrig, Steven A. Silvers, The Google's Children's Workshop, Inc., The Aurora Educational Group, the Fun with Science Club, Stelor Productions, LLC and/or Stelor Productions, Inc. regarding Stelor's mark or Stelor's goods and services or the Googles.com website or Googles.com domain name. These requests are irrelevant, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to production request 38, the request seeks contracts or agreements regarding the proceeds of Stelor's lawsuit against Google, Inc. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are irrelevant, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to production requests 39-41, the requests seek all of Stelor's financial documents. Stelor has provided Defendant/Counter-Plaintiff with Stelor's un-audited financials for 2002 through 2007. These matters are in no way related to the claims brought by Stelor or the Defendants/Counter-Plaintiffs and/or they have already been the subject of the Defendant/Counter-Plaintiff's inquiry. These requests are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production requests 44, 46, 47, 48, 49, 53, 54, 205-207, 217-219, the requests seeks documents that identify the names addresses and telephone numbers of every individual who has ever worked for Stelor, worked with Stelor, been a director of Stelor, or invested in Stelor, and the ownership percentage and capital invested as to any member past or present. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to production request 45, the request seeks the operating agreement for Stelor Productions, LLC. This is highly sensitive company information that is in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This request is irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to production request 55, the request seeks Stelor's meeting minutes regarding Stelor's marks, Googles branded goods or services and lawsuits about Stelor's marks, goods and services. This is highly sensitive company information that is in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This request is irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery and subject to confidentiality.

As to production request 66-67 the request seeks records and copies of checks or other documents showing Steven A. Esrig's stock holdings or investments in the Aurora Collection, Inc. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This request is irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery and an invasion of privacy.

As to production request 98-106 the Plaintiff asks for all discovery from a laundry list of litigation in which Stelor has been involved. This would in essence give the Defendant/Counter-Plaintiff the benefit of multiple un-retained counsel and provide them with multiple bites of the discovery apple. This request is irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery and subject to confidentiality.

As to production requests 120-136, these requests deal with separate entities all of which, with the exception of Stelor Technologies, LLC, are investors in Stelor Productions, LLC. Stelor Technologies, LLC is a wholly owned subsidiary of Stelor Productions, LLC that has nothing to do with the Googles brand, Googles Trademarks or the Oogle,

Oogle or Iggle trademarks. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are not only irrelevant, overbroad, unduly burdensome, and outside the scope of discovery, they are also an invasion into the privacy of the referenced entities and seem to be a weak attempt to pierce the corporate veil.

As to production requests 138-142, these requests seek information about some unidentified entity or organization called "The Googles". The Plaintiff cannot identify who or what the Defendant/Counter-Plaintiff is referring to. These requests are irrelevant, overbroad, and unduly burdensome.

As to production requests 144-145, 154-155, these requests deal with separate unrelated litigation matters which Stelor has been involved. The Defendant/Counter-Plaintiff requests all of the pleadings from all of these matters as well as correspondence with attorneys. Additionally, the Defendant/Counter-Plaintiff requests agreements between Stelor, LLC and Stelor as to proceeds from the litigation with Google, Inc. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are irrelevant, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to production requests 137, 148, 149-152, 169-171, these requests deal with a separate entity, namely The Aurora Collection, and are unrelated to the Googles, Oogle, Oogle or Iggle trademarks. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These requests are irrelevant, overbroad, overly burdensome and outside the scope of permissible discovery.

As to production request 153, this request seeks information completely unrelated to the Defendant/Counter-Plaintiff's claims. These requests are irrelevant and overly burdensome.

As to production requests 157-158, these requests deal with the zoning and permitting of Stelor's offices. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs and could only be meant to harass the Plaintiff/Counter-Defendants. These requests are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production requests 159-163, 166, 167, 168, 171, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, these requests deal with separate individuals and entities, including the Aurora Collection, Steven A. Silvers, SAS Entertainment Group and The Googles Children's Workshop. These materials have already been the subject of the Defendant/Counter-Plaintiff's inquiry and the Plaintiff has already provided all materials requested. These requests are irrelevant, duplicitous, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production request 188, this request does not identify what is identified by the reference to "its". As such Plaintiff/Counter-Defendant is unable to provide a response.

As to production requests 172, 173, 174, 175, these requests seek information as to an entity known as E.G.G. International, LLC. This is a separate legal entity from Stelor Productions, LLC. Stelor does not have possession of records for E.G.G. International and these matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs and/or they have already been the subject of the Defendant/Counter-Plaintiff's inquiry. These requests are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production request 190, this request seeks information regarding the conversion of Stelor Productions, Inc from a corporation to a limited liability company. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production requests 189, 193-201, 204, 210-213, 220, the Defendant/Counter-Plaintiff. These have already been the subject of the Defendant/Counter-Plaintiff's inquiry. These requests are irrelevant, duplicitous, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to production request 216, this request deals with "The Troodles from Troo". "The Troodles from Troo" is another character set developed by Stelor. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This request is irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to all remaining production requests in dispute, Stelor objects to those production requests as irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery or subject to privilege.

Interrogatories

More specifically as to each request the Plaintiff raises the following objections:

As to interrogatory 7, this interrogatory seeks the names, addresses and telephone numbers of all individuals that prepared or maintained Stelor's accounting and financial records. Stelor has provided Defendant/Counter-Plaintiff with Stelor's un-audited financials for 2002 through 2007. This interrogatory is irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 13-16, 24, 148, 149, 150, 160, 161, 162, 164, 165, 166, 167, 168 these interrogatories seek the names addresses and telephone numbers of every individual who has ever worked for Stelor, worked with Stelor, invested in Stelor or who have lived or worked at 14701 Mockingbird Drive. These interrogatories go beyond the bounds of

acceptable discovery. These interrogatories are irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery and an invasion of privacy.

As to interrogatories 25-29, 31-34, these interrogatories seek information about the investors of Stelor Productions, LLC in a misguided attempt to pierce the corporate veil. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery and an invasion of privacy.

As to interrogatories 28 and 30, these interrogatories seek information about Stelor Technologies, LLC and The Stelor Group Limited, LLC. Stelor Technologies, LLC is a subsidiary of Stelor Productions, LLC and develops child safety programs and protocols. The Stelor Group Limited, LLC is a subsidiary of Stelor Productions, LLC and holds character sets developed by Stelor Productions, LLC other than the Googles. Stelor Technologies, LLC and The Stelor Group Limited have nothing to do with the Googles brand, the Googles trademark or the Oogle, Oggle or Iggle marks other than the utilization of a security protocol developed by Stelor Technologies known as Pixkey on the Googles.com website. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to Interrogatories 33-34, these interrogatories seek information about E.G.G. International, LLC. E.G.G. International is a consulting company owned by Steven A. Esrig. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs.

As to interrogatory 35-39, these interrogatories seek information about criticism of Steven A. Esrig's performance as President or CEO of Stelor Productions, LLC. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to interrogatory 40, this interrogatory seeks information about some imaginary and unidentified entity the Defendant/Counter-Plaintiff labels as "The Googles". The term the "The Googles" includes the Stelor's trademark "Googles" and identifies one of Stelor's character sets which includes Stelor's main characters, "Oogle", "Iggle" and "Oggle", also Stelor trademarks. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 41-54, these interrogatories run through a laundry list of names that at some points is so long the Defendant/Counter-Plaintiff utilizes a "gg" subsection. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatory 32, 55-59, these interrogatories seek information about Nikken, Inc., a company that sells wellness products through network marketing. Stelor Productions, LLC does no business with Nikken, Inc. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to interrogatory 60, this interrogatory seeks information about threats to kill Steven A. Esrig, These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This interrogatory is irrelevant, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 61-62, these interrogatories seek information about the connection between Stelor and an individual named Mike DiMuccio and The Aurora Collection, Inc. Mike DiMuccio is a former Stelor board member and The Aurora Collection, Inc. was the predecessor in interest to the "Googles" license. The Defendant/Counter-Plaintiff has already inquired into the relevant aspects of The Aurora Collection, Inc. business. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 65-72, these interrogatories seek information about the leasing, licensing, zoning and inhabitants of Stelor's Productions, LLC offices. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad and unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 73-85 & 87, 169, 170 these interrogatories seek information related to the operation of the Googles Children's Workshop and SAS Entertainment Group. These are separate legal entities unrelated to Stelor Productions or Steven A. Esrig. Neither Stelor nor Mr. Esrig hold an interest in either of these companies. This inquiry covers all of the same ground Defendant/Counter-Plaintiff's previous inquiries have covered and Plaintiff has already provided information as to these matters. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 88-122, 170 these interrogatories seek information with regard to The Aurora Collection, Inc. The Aurora Collection is a separate legal entity unrelated to Stelor Productions, LLC. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 123-124. these interrogatories seek information regarding the conversion of Stelor Productions from an Corporation to a Limited Liability Company.

These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 125-139, these interrogatories seek information regarding the sale of “Googles” branded goods or services including, plush toys books. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding sales of “Googles” branded books that could be found in its possession after a reasonable, diligent and thorough search. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 140-142, these interrogatories seek information regarding the sale of “Googles” branded music on i-Tunes. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding sales of “Googles” branded music on i-Tunes that could be found in Stelor’s possession after a reasonable, diligent and thorough search. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 143-146, these interrogatories seek information regarding “Googles” branded live and pre-recorded broadcast performances. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding “Googles” branded live and pre-recorded broadcast performances that could be found in Stelor’s possession after a reasonable, diligent and thorough search. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatory 147, this interrogatory seeks information regarding “Googles” branded live and pre-recorded broadcast performances. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding “Googles” licensing that could be found in Stelor’s possession after a reasonable, diligent and thorough search. This interrogatory are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 151-158, these interrogatories seek information regarding the sale of “Googles” branded merchandise. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding “Googles” branded merchandise that could be found in Stelor’s possession after a reasonable, diligent and thorough

search. These interrogatories are irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to interrogatory 163, this interrogatory seeks information regarding “The Troodles from Troo”. “The Troodles from Troo” is another character set developed by Stelor. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. This interrogatory is irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 171, 172, 173, these interrogatories seek information about trademark oppositions, domain name disputes and lawsuits regarding Stelor’s mark. These matters have already been the subject of the Defendant/Counter-Plaintiff’s inquiry. The additional inquiry covers all of the same ground Defendant/Counter-Plaintiff’s previous inquiry covered. The Defendant/Counter-Plaintiff has been provided all of the records regarding “Googles” branded merchandise that could be found in Stelor’s possession after a reasonable, diligent and thorough search. These interrogatories are irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to interrogatories 174-178, these interrogatories seek information about Steven A. Esrig’s visits to the offices of The Aurora Collection, Inc. and Steven A. Silvers. These matters are in no way related to the claims or defenses brought by Stelor or those brought by Defendants/Counter-Plaintiffs. These interrogatories are irrelevant, overbroad, unduly burdensome and outside the scope of permissible discovery.

As to interrogatories 179-183, these interrogatories seem to be litigating the Stelor Productions, LLC v. Google, Inc. matter, and not the matter presently before the court. These interrogatories are irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery and subject to privilege.

As to all remaining production requests in dispute, Stelor objects to those production requests as irrelevant, overbroad, unduly burdensome, outside the scope of permissible discovery or subject to privilege.