

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,

Plaintiff,

v.

OOGLES N GOOGLES FRANCHISING,
LLC, *et al.*

Defendants.

)
)
)
) Case No. 1:05-cv-0354-DFH-TAB
)
)
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)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 1

All documents that show that Stelor Productions, LLC, owns the trademarks it asserts against Defendants.

RESPONSE:

Without waiving, and subject to, its General objections, Stelor responds that it will produce non-privileged documents that are responsive to this request, to the extent such documents are found within its possession, custody or control after a reasonable and diligent search.

STELOR PRODUCTIONS, INC., OOGLES N GOOGLES et al

Doc. 287 Att. 2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,

Plaintiff,

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LLC, *et al.*

Defendants.

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) Case No. 1:05-cv-0354-DFH-TAB
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OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 2

Business plans of Stelor from 2002 to the present.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 3

Marketing plans of Stelor from 2002 to the present.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 4

Organizational charts for Stelor from 2002 to the present.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)

Plaintiff,)

v.)

Case No. 1:05-cv-0354-DFH-TAB

OOGLES N GOOGLES FRANCHISING,)
LLC, *et al.*)

Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 5

All prospectuses, private placement memoranda, or other documents soliciting investments in Stelor.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 10

All correspondence, including emails, to and from Steven A. Silvers or his counsel regarding alleged breaches of contract by Stelor or by Steven A. Silvers.

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
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STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 33

All contracts or agreements between or among Steven Esrig, Steven A. Silvers, The Googles Children's Workshop, Inc., Silvers Entertainment Group, SAS Entertainment Group, The Aurora Collection, Inc., The Aurora Educational Group, the Fun with Science Club, Stelor Productions LLC, and/or Stelor Productions, Inc. regarding Stelor's marks or Stelor's goods and services.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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Plaintiff,)
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v.) Case No. 1:05-cv-0354-DFH-TAB
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GOOGLES N GOOGLES FRANCHISING,)
LLC, *et al.*)
)
Defendants.)

GOOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 34

All settlement agreements and release documents for all lawsuits between or among The Googles Children's Workshop Inc., Steven Esrig, Steven A. Silvers, Silvers Entertainment Group, SAS Entertainment Group, The Aurora Collection, Inc., the Aurora Educational Group, the Fun with Science Club, Stelor Productions LLC, and/or Stelor Productions, Inc.

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 36

All correspondence, including e-mails, to and from Steven A. Silvers or his counsel, regarding lawsuits involving Stelor, Steven A. Silvers, Stelor's goods and services, and/or Stelor's marks.

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
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 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 38

All contracts or agreements regarding the proceeds of Stelor's lawsuit against Google, Inc., including, but not limited to, any such contracts or agreements with Steven A. Silvers or with any investor or officer of Stelor Productions LLC or Stelor Productions, Inc.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 39

Monthly general ledgers, income statements, balance sheets and statements of cash flows for Stelor Productions, Inc. and Stelor Productions, LLC, from 2001 to the present.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it will produce non-privileged documents that are responsive to this request, to the extent such documents are found within its possession, custody or control after a reasonable and diligent search.

05/12/08

Stelor Productions, LLC
Profit and Loss Standard
February 2002 through December 2007

	Feb '02 - Dec '07
Income	
4400 — Royalty Income	124.42
4950 — Interest Income	11,335.51
4999 — Miscellaneous Income	8,972.01
Total Income	20,431.94
Cost of Goods Sold	
5000 — Cost of Sales	
5100 — Broadcast COGS	0.00
Total 5000 — Cost of Sales	0.00
Total COGS	0.00
Gross Profit	20,431.94
Expense	
Information Systems	99.00
1120 — Petty Cash	-200.00
6000 — Payroll	
Payroll Expenses	173.44
6001 — Employee Payroll	
6010 — Payroll Expenses	1,094,140.75
6011 — Executive Salaries	113.87
6001 — Employee Payroll - Other	4,051,538.74
Total 6001 — Employee Payroll	5,145,793.36
6012 — Office Salaries	13,311.43
6015 — Payroll Taxes	
6016 — Employee Taxes	-140.99
6017 — Employer Taxes	
Medicare Comp	2.51
Social Securi	3,959.87
6017-1 — FUTA Tax	3,047.27
6017-2 — SUTA Tax	2,814.02

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
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STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 40

Annual general ledgers, income statements, balance sheets and statements of cash flows for Stelor Productions, Inc. and Stelor Productions, LLC, from 2001 to the present.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it will produce non-privileged documents that are responsive to this request, to the extent such documents are found within its possession, custody or control after a reasonable and diligent search.

05/12/08

Stelor Productions, LLC
Profit and Loss Standard
 February 2002 through December 2007

Feb '02 - Dec '07

Income		
4400 — Royalty Income		124.42
4950 — Interest Income		11,335.51
4999 — Miscellaneous Income		8,972.01
<hr/>		
Total Income		20,431.94
Cost of Goods Sold		
5000 — Cost of Sales		
5100 — Broadcast COGS		0.00
<hr/>		
Total 5000 — Cost of Sales		0.00
<hr/>		
Total COGS		0.00
Gross Profit		20,431.94
Expense		
Information Systems		99.00
1120 — Petty Cash		-200.00
6000 — Payroll		
Payroll Expenses		173.44
6001 — Employee Payroll		
6010 — Payroll Expenses	1,094,140.75	
6011 — Executive Salaries	113.87	
6001 — Employee Payroll - Other	4,051,538.74	
<hr/>		
Total 6001 — Employee Payroll		5,145,793.36
6012 — Office Salaries		13,311.43
6015 — Payroll Taxes		
6016 — Employee Taxes		-140.99
6017 — Employer Taxes		
Medicare Comp	2.51	
Social Securi	3,959.87	
6017-1 — FUTA Tax	3,047.27	
6017-2 — SUTA Tax	2,814.02	

05/12/08

Stelor Productions, LLC
Profit and Loss Standard
February 2002 through December 2007

Feb '02 - Dec '07

Income		
4400 — Royalty Income		124.42
4950 — Interest Income		11,335.51
4999 — Miscellaneous Income		8,972.01
Total Income		20,431.94
Cost of Goods Sold		
5000 — Cost of Sales		
5100 — Broadcast COGS		0.00
Total 5000 — Cost of Sales		0.00
Total COGS		0.00
Gross Profit		20,431.94
Expense		
Information Systems		99.00
1120 — Petty Cash		-200.00
6000 — Payroll		
Payroll Expenses		173.44
6001 — Employee Payroll		
6010 — Payroll Expenses	1,094,140.75	
6011 — Executive Salaries	113.87	
6001 — Employee Payroll - Other	4,051,538.74	
Total 6001 — Employee Payroll		5,145,793.36
6012 — Office Salaries		13,311.43
6015 — Payroll Taxes		
6016 — Employee Taxes		-140.99
6017 — Employer Taxes		
Medicare Comp	2.51	
Social Securi	3,959.87	
6017-1 — FUTA Tax	3,047.27	
6017-2 — SUTA Tax	2,814.02	

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
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 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 45

The operating agreement for Stelor Productions, LLC.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 46

Documents that identify the share of ownership of all past and present members (owners) of Stelor Productions, LLC.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 48

Documents that identify the names, addresses, and/or phone numbers of all past and present investors in Stelor Productions, LLC.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
)
 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 49

Documents that identify the capital invested in Stelor Productions, LLC by any past or present investor.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 51

By-laws for Stelor Productions, Inc.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 53

Documents that identify the names, addresses and/or phone numbers of all past and present directors of Stelor Productions, Inc.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 54

Documents that show all capital investments in or stock purchases from Stelor Productions, Inc.

RESPONSE:

Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
)
 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 55

All of Stelor's meeting minutes with information regarding Stelor's marks, Googles branded goods or services, or the lawsuits about Stelor's marks, goods and services, including minutes of meetings of owners, members, shareholders, officers, and/or directors.

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege. Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,

Plaintiff,

v.

OOGLES N GOOGLES FRANCHISING,
LLC, *et al.*

Defendants.

)
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) Case No. 1:05-cv-0354-DFH-TAB
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OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 64

Any and all agreements or contracts between or among Steven A. Silvers, Silvers Entertainment Group, SAS Entertainment Group, The Aurora Collection, Inc., The Aurora Educational Group, Steven Esrig, Stelor Productions, Inc. or Stelor Productions, LLC regarding the Googles.com website or the Googles.com domain name

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
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 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 65

All agreements or contracts between or among The Aurora Collection, Inc., Steven Esrig, Steven A. Silvers, Stelor Productions, Inc., and/or Stelor Productions, LLC.

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
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STELOR PRODUCTIONS, LLC,)
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 LLC, *et al.*)
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 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 66

All records of Steven Esrig's stock holdings or investment in The Aurora Collection, Inc.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it has no documents that are responsive to this request, but reserves the right to supplement responses when it becomes aware of documents or information.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
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STELOR PRODUCTIONS, LLC,)
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OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 67

Copies of checks or other documents showing Steven Esrig's investment in The Aurora Collection, Inc.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it has no documents that are responsive to this request, but reserves the right to supplement responses when it becomes aware of documents or information.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)

Plaintiff,)

v.)

Case No. 1:05-cv-0354-DFH-TAB)

OOGLES N GOOGLES FRANCHISING,)
LLC, *et al.*)

Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 78

All notes of telephone conversations with Steven A. Silvers or his counsel regarding Stelor's marks, Googles branded goods or services, or lawsuits involving Stelor, Stelor's marks, or Googles branded goods or services

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it has no documents that are responsive to this request, but reserves the right to supplement responses when it becomes aware of documents or information.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
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STELOR PRODUCTIONS, LLC,)
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 Plaintiff,)
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 v.) Case No. 1:05-cv-0354-DFH-TAB
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 LLC, *et al.*)
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 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 98

Deposition transcripts (and exhibits thereto) for depositions taken regarding the following lawsuits, including, but not limited to, any deposition of Steven Esrig and/or Steven Silvers:

- a. *Stelor Productions, LLC v. Google Inc.*, U.S. District Court, Southern District of Florida, Case No. 05-80387
- b. *Silvers v. Stelor Productions, LLC*, Circuit Court Miami-Dade County, Florida, Cause No. 05-18033 CA 03
- c. *Stelor Productions, Inc. v. Silvers*, U.S. District Court, Southern District of Florida, Case No. 04-80954
- d. *Stelor Productions, LLC v. Silvers*, U.S. District Court, Southern District of Florida, Case No. 05-80393
- e. *Steven A. Silvers v. Google Inc.*, U.S. District Court, District of Maryland, Case No. 1:06 CV 02658-WAN
- f. *Stelor Productions, LLC v. Lindsey R. Miller*, Circuit Court for Montgomery County Maryland, Case No. 272024-V
- g. *Stelor Productions, LLC v. Steven A. Silvers*, Circuit Court for Montgomery County, Maryland, Case No. 272023-V

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of

permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving, and subject to, its General objections, Stelor responds that it has no documents that are responsive to this request, but reserves the right to supplement responses when it becomes aware of documents or information.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
)
 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 104

All sworn testimony in affidavits or declarations of Steven Esrig with information regarding Stelor's marks, Googles branded goods or services, or lawsuits regarding the GOOGLES Marks

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
)
 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 105

All transcripts (including exhibits) of depositions of Steven Silvers with information regarding Stelor's marks, Googles branded goods or services, or lawsuits regarding the GOOGLES Marks

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)
)
 Plaintiff,)
)
 v.) Case No. 1:05-cv-0354-DFH-TAB
)
 OOGLES N GOOGLES FRANCHISING,)
 LLC, *et al.*)
)
 Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 106

All sworn testimony in affidavits or declarations of Steven Esrig with information regarding Stelor's marks, Googles branded goods or services, or lawsuits regarding the GOOGLES Marks

RESPONSE:

In addition to its General Objections, Stelor objects to this request to the extent it seeks documents that are protected by the attorney-client privilege, and/or the work product privilege and/or joint prosecution privilege. Stelor also objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STELOR PRODUCTIONS, LLC,)

Plaintiff,)

v.)

Case No. 1:05-cv-0354-DFH-TAB

OOGLES N GOOGLES FRANCHISING,)
LLC, *et al.*)

Defendants.)

OOGLES N GOOGLES' FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

REQUEST NO. 118

All documents and things that identify the names, addresses, and/or phone numbers of all the past and present employees of Stelor Productions, Inc.

RESPONSE:

In addition to its General Objections, Stelor objects to this request as being overly broad, unduly burdensome and as seeking documents outside the scope of permissible discovery in that it seeks information that is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence.