

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

STELOR PRODUCTIONS LLC)	
)	
)	
Plaintiff)	
)	
)	Case Number: 1:05-CV-0354-DFH-TAB
v.)	
)	
)	
OOGLES N GOOGLES FRANCHISING)	
LLC, <i>et. al.</i>)	
)	
Defendants)	

DEFENDANTS' SECOND INTERROGATORIES TO PLAINTIFF

All Defendants, except those that have not been served with process, by counsel, respectfully submit the following Interrogatories pursuant to F.R.C.P. 33 to be answered by Plaintiff within (30) days:

DEFINITIONS

“Stelor” means Stelor Productions, Inc. and/or Stelor Productions, LLC.

“Oogles n Googles” means Oogles n Googles Franchising LLC

“Googles logo” refers to the word and design federally registered as a trademark as Registration No. 2,087,590.

“Stelor’s marks” means the Googles logo, the word Googles used as a word mark, the word mark Oogle, the word mark Oggle, and/or the word mark Iggle.

“Googles branded” means placed into the stream of commerce or offered for sale with the Googles logo, the word Googles, the word Oogle, the word Oggle, and/or the word Iggle used as a trademark to identify the source or origin of goods or services.

INTERROGATORIES

25. Please state whether a company named Stelor LLC, Maryland Department of Assessment and Taxation I. D. No. W11176153, is related to or affiliated with Stelor. Please also respond fully to subparts (a)-(i) even if your answer is “None” or a similar response.

ANSWER:

- a. Describe fully the nature of Stelor LLC’s business, including in your answer all goods and services sold or offered for sale by Stelor LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Stelor LLC and Stelor.

ANSWER:

- c. State the principal place of business of Stelor LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both The Stelor LLC and Stelor of all shared officers and/or managers of The Stelor LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of Stelor LLC and Stelor.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments of in both Stelor LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all shared employees of Stelor LLC and Stelor.

ANSWER:

- h. Identify all contracts or agreements between Stelor LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

26. Please state whether a company named Stelor Investors LLC, Maryland Department of Assessments and Taxation I. D. No. W1194966, is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (i) even if your answer is “None” or a similar response.

ANSWER:

- a. Describe fully the nature of Stelor Investors LLC's business, including in your answer all goods and services sold or offered for sale by Stelor Investors LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Stelor Investors LLC and Stelor.

ANSWER:

- c. State the principal place of business of Stelor Investors LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both Stelor Investors LLC and Stelor of all shared officers and/or managers of Stelor Investors LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of Stelor LLC and Stelor.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments of both Stelor Investors LLC and Stelor.

ANSWER:

- g. State the names, addresses, and telephone numbers of all shared employees of Stelor Investors LLC and Stelor

ANSWER:

- h. Identify all contracts or agreements between Stelor Investors LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- 27. Please state whether a company named Stelpro Investors LLC, Maryland Department of Assessments and Taxation I.D. No. W1194966, is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (i) even if your answer is “None” or a similar response.

ANSWER:

- a. Describe fully the nature of Stelpro Investors LLC's business, including in your answer all goods and services sold or offered for sale by Stelpro Investors LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Stelpro Investors LLC and Stelor.

ANSWER:

- c. State the principal place of business of Stelpro Investors LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both Stelpro Investors LLC and Stelor of all shared officers and/or managers and of Stelpro Investors LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of Stelpro Investors LLC and Stelor

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments in both Stelpro Investors LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all shared employees of Stelor Investors LLC and Stelor.

ANSWER:

- h. Identify all contracts or agreements between Stelpro Investors LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods or services, or packaging thereof.

ANSWER:

- 28. Please state whether a company named The Stelor Group Limited, LLC, Maryland Department of Assessments and Taxation I. D. No. Z22534344, is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (i) even if your answer is “None” or a similar response.

ANSWER:

- a. Describe fully the nature of The Stelor Group Limited, LLC business, including in your answer all goods and services sold or offered for sale by The Stelor Group Limited, LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between The Stelor Group Limited, LLC and Stelor.

ANSWER:

- c. State the principal place of business of The Stelor Group Limited, LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both The Stelor Group Limited, LLC and Stelor of all shared officers and/or managers of The Stelor Group limited, LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of The Stelor Group Limited, LLC and Stelor.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments in both The Stelor Group Limited, LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all shared employees of and The Stelor Group Limited, LLC and Stelor.

ANSWER:

- h. Identify all contracts or agreements between The Stelor Group Limited, LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- 29. Please state whether a company named Stelor Productions I, LLC, a Delaware limited liability company, is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (i) even if your answer is "None" or a similar response.

ANSWER:

- a. Describe fully the nature of Stelor Productions I, LLC's business, including in your answer all goods and services sold or offered for sale by Stelor Productions I, LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Stelor Productions I, LLC and Stelor.

ANSWER:

- c. State the principal place of business of Stelor Productions I, LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both Stelor Productions I, LLC and Stelor of all shared officers and/or managers of Stelor Productions I, LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of Stelor Productions I, LLC and Stelor.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments in both Stelor Productions I, LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all shared employees of Stelor Productions I, LLC and Stelor

ANSWER:

- h. Identify all contracts or agreements between Stelor Productions I, LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were sold or are marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- 30. Please state whether a company named Stelor Technologies LLC, Maryland Department of Assessments and Taxation I. D. No. Z11534351, is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (i) even if your answer is “None” or a similar response.

ANSWER:

- a. Describe fully the nature of Stelor Technologies LLC's business, including in your answer all goods and services sold or offered for sale by Stelor Technologies LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Stelor Technologies LLC and Stelor.

ANSWER:

- c. State the principal place of business of Stelor Technologies LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles for both Stelor Technologies LLC and Stelor of all shared officers and/or managers and of Stelor Technologies LLC and Stelor.

ANSWER:

- e. State the names, addresses, and phone numbers of all shared directors of Stelor Technologies LLC and Stelor.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments in both Stelor Technologies LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all shared employees of Stelor Technologies LLC and Stelor

ANSWER:

- h. Identify all contracts or agreements between Stelor Technologies LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (c) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- 31. Please state whether a company named Goo Investments LLC is related to or affiliated with Stelor. Please also respond fully to subparts (a) – (j) even if your answer is "None" or a similar response.

ANSWER:

- a. Describe fully the nature of Goo Investments LLC's business, including in your answer all goods and services sold or offered for sale by Goo Investments LLC.

ANSWER:

- b. Describe fully the nature of the business relationship between Goo Investments LLC and Stelor.

ANSWER:

- c. State the principal place of business of Goo Investments LLC.

ANSWER:

- d. State the names, addresses, and phone numbers, and titles of all officers and/or managers and of Goo Investments LLC

ANSWER:

- e. State the names, addresses, and phone numbers of all directors of Goo Investments LLC.

ANSWER:

- f. State the names, addresses, and phone numbers of all investors with investments in both Goo Investments LLC and Stelor.

ANSWER:

- g. State the names, addresses, and phone numbers of all employees of Goo Investments LLC.

ANSWER:

- h. Identify all contracts or agreements between Goo Investments LLC and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- i. State which, if any, of the goods or services identified in subpart (a) were or are sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- j. Please identify the state (*e.g.* Delaware) under whose laws Goo Investments LLC was formed and set forth any state issued identification numbers (including the name of the issuing agency) for Goo Investments, LLC.

ANSWER:

32. Please describe full the business of Nikken, Inc. and Steven Esrig's business relationship with Nikken, Inc., including a description of the goods or services offered for sale by Nikken, Inc. and a description of the goods or services offered for sale by Steven Esrig.

ANSWER:

33. Please state the following information regarding a company known as E.G.G. International, LLC:

- a. The date E.G.G. International was formed.

ANSWER:

- b. Whether E.G.G. International, L.L.C, is or was a distributor, independent consultant or was otherwise affiliated with Nikken Inc., and if so, describe fully the nature of the relationship of E. G. G. International, LLC with Nikken, Inc.

ANSWER:

- c. Describe fully the nature of E. G. G. International, LLC's business including all goods and services sold or offered for sale by E. G. G. International, LLC.

ANSWER:

- d. Describe fully the nature of the business relationship between E. G. G. International, LLC and Stelor.

ANSWER:

- e. Describe fully the nature of the business relationship between E.G.G. International, LLC. and The Aurora Collection, Inc.

ANSWER:

- f. State whether E. G. G. International, LLC is still doing business, and if not, the date that E. G. G. International, LLC ceased doing business.

ANSWER:

- g. State the principal place of business of E. G. G. International, LLC.

ANSWER:

- h. State the names, addresses, and telephone numbers, and titles for both
E. G. G. International, LLC and Stelor of all shared officers and/or managers of
E. G. G. International, LLC and Stelor.

ANSWER:

- i. State the names, addresses, and phone numbers of all shared directors of
E. G. G. International, LLC and Stelor.

ANSWER:

- j. State the names, addresses, and phone numbers of all investors with
investments in both E. G. G. International, LLC and Stelor.

ANSWER:

- k. State the names, addresses, and phone numbers of all shared employees of E. G. G.
International, LLC and Stelor.

ANSWER:

- l. State the names, addresses, and telephone numbers, and titles for both
E.G.G. International, LLC and The Aurora Collection, Inc. of all shared
Officers and/or managers of E.G.G. International, LLC and The Aurora
Collection, Inc.

ANSWER:

- m. State the names, addresses, and phone numbers of all shared directors of E.G.G. International, LLC and The Aurora Collection, Inc.

ANSWER:

- n. State the names, addresses, and phone numbers of all investors with investments in both E.G.G. International, LLC and The Aurora Collection, Inc.

ANSWER:

- o. State the names, addresses, and phone numbers of all shared employees of E.G.G. International, LLC and The Aurora Collection, Inc.

ANSWER:

- p. Identify all contracts or agreements between E. G. G. International, LLC and Stelor. (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's mark, Googles branded goods or services or lawsuits pertaining to Stelor's marks and/or to Googles' branded or services.

ANSWER:

- q. State which, if any, of the goods or services identified in subpart (c) were sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- r. Please identify the state (*e.g.* Delaware) under whose laws E. G. G. International, LLC was formed and set forth any state issued identification numbers (including name of the issuing agency) for E. G. G. International, LLC

ANSWER:

- s. If the letters “E”, “G”, and “G”, in E.G.G. International’s name are initials of one or more people, state the name, address, and phone number of those people and describe fully their relationship with E.G.G. International, LLC.

ANSWER:

34. Please state the following with respect to the business relationship between E.G.G. International, LLC and The Aurora Collection, Inc.:

- a. State the beginning and ending dates of the business relationship between E.G.G. International, LLC and the Aurora Collection, Inc.

ANSWER:

- b. Describe fully all products or services provided by E.G.G International, LLC to The Aurora Collection, Inc.

ANSWER:

- c. State whether The Aurora Collection, Inc. was a distributor, independent consultant, or was otherwise affiliated with Nikken, Inc.

ANSWER:

- d. State all the names, addresses, and phone numbers of all personnel of The Aurora Collection, Inc. that provided any goods or services to E.G.G. International, Inc. and describe fully the goods or services provided by each person identified.

ANSWER:

- e. State the names, addresses and telephone numbers of all E.G.G. International, LLC personnel that provided goods or services to The Aurora Collection, Inc., and describe fully the goods or services provided by each person identified.

ANSWER:

- f. Identify all contracts or agreements between E.G.G. International, LLC and The Aurora Collection, Inc. (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

35. State the names, addresses, and telephone numbers of all Stelor directors, current or former, that have orally or in writing criticized Steven Esrig's performance as President and/ or CEO of Stelor, and for each director identified, set forth fully the date the director criticized Esrig, set forth fully the director's criticism of Esrig, and identify all documents, including correspondence or e-mail, written by any past or present director expressing criticism of Esrig's performance as Stelor President and/or CEO.

ANSWER:

36. State the names, addresses, and telephone numbers of all Stelor investors, current or former, that have orally or in writing criticized Steven Esrig's performance as President and/or CEO of Stelor, and for each investor identified, set forth fully the date the investor criticized Esrig, set forth fully the investor's criticism of Esrig, and identify all documents, including correspondence or e-mail, written by any past or present investor expressing criticism of Esrig's performance as Stelor's President and/or CEO.

ANSWER:

37. State the names, addresses, and telephone numbers of all Stelor's current or former employees that have orally or in writing criticized Steven Esrig's performance as President and/ or CEO of Stelor, and for each employee identified, set forth fully the

date the employee criticized Esrig, set forth fully the employees' criticism of Esrig, and identify all documents, including correspondence or e-mail, from any past or present employee expressing criticism of Esrig's performance as Stelor's President and/or CEO.

ANSWER:

38. If Steven Esrig is no longer the President of Stelor, state the date he was discharged from this office, state why he was discharged from this office, and state the name, address, and telephone number of the current President of Stelor.

ANSWER:

39. If Steven Esrig is no longer the CEO of Stelor, state the date he was discharged from this position, state why he was discharged from this position, and state the name, address, and telephone number of the current CEO of Stelor.

ANSWER:

40. Please state whether or not there exists a business enterprise, subsidiary or other enterprise affiliated with Stelor named "The Googles", and if so, please state the following information:

- a. The date "The Googles" was formed.

ANSWER:

- b. Describe fully the nature of The Googles business, including in your answer all goods and services sold or offered for sale by The Googles.

ANSWER:

- c Describe fully the nature of the business relationship between The Googles and Stelor.

ANSWER:

- d. State the principal place of business of The Googles.

ANSWER:

- e. State the names, addresses, and phone numbers, and titles of all officers and/or managers of The Googles.

ANSWER:

- f. State the names, addresses, and phone numbers of all directors of The Googles.

ANSWER:

- g State the names, addresses, and phone numbers of all with investments in The Googles.

ANSWER:

- h. State the names, addresses, and phone numbers of all employees of
The Googles.

ANSWER:

- i Identify all contracts or agreements between The Googles and Stelor (in sufficient detail for Defendants to prepare a Request for Production) that pertain to Stelor's marks, Googles branded goods or services, or lawsuits pertaining to Stelor's marks and/or Googles branded goods or services.

ANSWER:

- j. State which, if any, of the goods or services identified in subpart (c) were sold marked with any of Stelor's marks and state which mark was placed on the goods, services, or packaging thereof.

ANSWER:

- k. Please identify the state (*e.g.* Delaware) under whose laws The Googles was formed and set forth any state issued identification numbers (including the name of the issuing agency) for The Googles.

ANSWER:

41. Please describe fully the relationship of the below listed individuals with Stelor, including in your answer any title these individuals hold with Stelor, their duties with or to Stelor, and the beginning and ending dates of their relationship with Stelor:

a. Michael DiMuccio

ANSWER:

b. Barbara Tannenbaum

ANSWER:

c. John Maitland

ANSWER:

d. Sharon M. Weinstein

ANSWER:

e. Carolee Hayes

ANSWER:

42. For the below listed individuals, please state whether they are officers or executives of The Googles, and if so, state the title of their office, the date they assumed office, a description of their duties or responsibilities with The Googles, and whether or not they are still officers or executives with The Googles:

a. Michael DiMuccio

ANSWER:

b. Barbara Tannenbaum

ANSWER:

c. John Maitland

ANSWER:

d. Sharon M. Weinstein

ANSWER:

e. Carolee Hayes

ANSWER:

43. For the below listed individuals, please describe fully their relationship to Stelor, including in your answer the beginning and ending dates of their relationship with Stelor, all titles they have held with Stelor, a full description of their responsibilities to Stelor, and a full description of all work they have done for Stelor:

a. Steven A. Esrig

ANSWER:

b. Lori Esrig

ANSWER:

c. Mark Silverman

ANSWER:

- d. Marty Jeffrey and/or Marty Jeffries

ANSWER:

- e. Rosemary Smith

ANSWER:

- f. Riva Elaine

ANSWER:

- g. Rive Esrig

ANSWER:

- h. Steve Perrie

ANSWER:

- i. John Pencola

ANSWER:

- j. Edson Saenz

ANSWER:

- k. Steven Hemstreet

ANSWER:

- l. Donny Friedman

ANSWER:

- m. Jay Patel

ANSWER:

- n. Jesse Voogt

ANSWER:

- o. Marieke Biers

ANSWER:

- p. Ron Vazquez

ANSWER:

- q. Greg Henle

ANSWER:

- r. Laura Warshauer

ANSWER:

- s. Thomas Varghese

ANSWER:

t. Micheal Sage

ANSWER:

u. Rebeca Gardner

ANSWER:

v. Bija Pandit

ANSWER:

w. Paul De Shontae

ANSWER:

x. Micheal Bateman

ANSWER:

y. Jason Gerber

ANSWER:

z. Stephen Biro

ANSWER:

aa. Paul Worsham

ANSWER:

bb. Lindsey Miller

ANSWER:

cc. Elan Eisenberg

ANSWER:

dd. Jeffery Schechter

ANSWER:

ee. Gregory J. Langford

ANSWER:

ff. Dean DePue

ANSWER:

gg. Julie DePue

ANSWER:

44. Please state the current or last known addresses and telephone numbers for the individuals listed in the previous interrogatory in subparts a-gg.

ANSWER:

45. Please state the name, address, telephone number, job title, job description, and beginning and ending dates of employment for any Stelor past or present employee not identified in the previous two (2) interrogatories.

ANSWER:

46. For the following individuals, please describe their relationship to Stelor, including in your answer the beginning and ending date of their relationship with Stelor, any titles they have held with Stelor, a full description of their responsibilities to Stelor, and a full description of all work they have done for Stelor:

- a. M. Shepard

ANSWER:

- b. F. Hildebrand

ANSWER:

- c. H. Tropin

ANSWER:

- d. Eric Cowan

ANSWER:

47. For the following individuals and entities that are believed to be consultants to Stelor, please state their addresses and telephone numbers, the beginning and ending dates of all work they have done for Stelor, a full description of all work they have done for Stelor, and the total fees they have charged to Stelor for services provided:

a. Jack Maitland

ANSWER:

b. Allison Green

ANSWER:

c. Steven A. Silvers

ANSWER:

d. Jeffery Schechter

ANSWER:

e. Finnegan Henderson, LLC

ANSWER:

f. Charles Barnett

ANSWER:

g. Lon Hall

ANSWER:

h. Shadows in Darkness

ANSWER:

i. Spinning Doors

ANSWER:

j. Salil Kumar

ANSWER:

k. Alka Soni

ANSWER:

l. Denzel Fiegelson

ANSWER:

m. Johnny Elkins

ANSWER:

n. Michael DiMuccio

ANSWER:

o. Marty Jeffery

ANSWER:

p. Joe Groia

ANSWER:

q. Cowan, Lebowitz, and Leitman

ANSWER:

r. Bazaar Strategies

ANSWER:

s. Scott Stefanski

ANSWER:

48. Please state the names, addresses, telephone numbers, of all consultants to Stelor not identified in the previous interrogatory, and for each consultant, please state the beginning and ending dates of all work they have done for Stelor, a full description of all work they have done for Stelor, and the total fees they have charged to Stelor for services provided:

ANSWER:

49. Please state the current or last known addresses for the following individuals believed

to be past or current directors of Stelor, and for each individual, state the beginning and ending dates (if applicable) of their tenure as directors:

- a. Henry Epstein

ANSWER:

- b. Robin Rothstein

ANSWER:

- c. Steven Weinstein

ANSWER:

- d. Stephen Weinstein

ANSWER:

- e. Robert Morse

ANSWER:

- f. Harvey Naglie

ANSWER:

50. Please state the current or last known address and phone numbers for any past or present director of Stelor not identified in the previous interrogatory, and to each director identified, state the beginning and ending dates of the tenure as director.

ANSWER:

51. For each of the below listed individuals or firms believed to be attorneys for Stelor, please state their address and telephone numbers, the beginning and ending dates of the legal work they have done for Stelor, the caption, case number, and venue for any litigated, or contested matters they have handled for Stelor, a description of the work they have performed, and the fees they have charged for services rendered:

- a. William (Bill) Borchard

ANSWER:

- b. Deborah Squiers

ANSWER:

- c.. Cowan, Lebowitz, Leitman

ANSWER:

- d. Lawrence (Larry) Hefter

ANSWER:

- e. Finnegan Henderson, LLC

ANSWER:

f. Yano Rubenstein

ANSWER:

g. Robert Morse

ANSWER:

h. Ira Edell

ANSWER:

i. John Neubauers

ANSWER:

52. Please state the names of any attorneys and law firms that have provided legal services to Stelor regarding Stelors marks not identified in the previous interrogatory and for each attorney and law firm identified, please state their name, address, phone numbers, the beginning and ending dates of the legal services they have performed for Stelor, a description of the work they have done, the case name, case number, and venue of any contested matters they worked on, and the fees they have charged and services rendered.

ANSWER:

53. For each of the following individuals or entities below that are believed to be investors in Stelor, please state their address, phone numbers, date(s) they invested in Stelor, their total investment in Stelor, and the number of share or units they own in Stelor:

a. Steven Esrig

ANSWER:

b. Henry Epstein

ANSWER:

c. Robert Rothstein

ANSWER:

d. Steven Weinstein

ANSWER:

e. Stephen Weinstein

ANSWER:

f. Robert Morse

ANSWER:

g. Harvey Naglie

ANSWER:

h. Michael A. Karian

ANSWER:

i. Marianne Bronstein

ANSWER:

j. Aaron Gadaous

ANSWER:

k. Barry Wilson

ANSWER:

l. Frank Francois

ANSWER:

m. Alan Gerber

ANSWER:

n. Sandra and Ronald Green

ANSWER:

o. Rebecca Bellin-Sonnenberg

ANSWER:

p. Wolfgang Sonnenberg

ANSWER:

q. Deborah Wetzler

ANSWER:

r. Good Vibrations International, Inc.

ANSWER:

s. Michael DiMuccio

ANSWER:

t. Delores and William Finister

ANSWER:

u. Igor Gruendl

ANSWER:

v. Trevor Carmichael

ANSWER:

w. Norma Esrig

ANSWER:

x. Garten Galeria A.G. and/or Pete Bernet

ANSWER:

y. Craig and Austria Hooks

ANSWER:

z. Goo Investments LLC

ANSWER:

aa. Stanley Bogusz

ANSWER:

bb. Robert Roth

ANSWER:

54. For each investor in Stelor not identified in the previous interrogatory, please state their name, current address, the date(s) they invested in Stelor, their total investment in Stelor, and the number or shares or units they own in Stelor.

ANSWER:

55. Please state the name, home address, business address, and telephone numbers for each Stelor current or former director that is or has been a distributor, independent consultant, associated with Nikken Inc.

ANSWER:

56. Please state the name, home address, business address, and telephone numbers for each Stelor current or former officer or manager that is or was a distributor, independent consultant or otherwise associated with Nikken, Inc.

ANSWER:

57. Please state the name, home address, business address, and telephone numbers for each Stelor current or former investor that is or was a distributor, independent consultant, or otherwise associated with Nikken Inc.

ANSWER:

58. Please state the name, home address, business address, and telephone numbers for each Stelor current or former consultant that is or was a distributor, independent consultant or otherwise associated with Nikken Inc.

ANSWER:

59. Please state the name, home address, business address, and telephone numbers for each Stelor current or former employee that is or was a distributor, independent consultant or otherwise associated with Nikken Inc.

ANSWER:

60. Please state the last known name, home address, and telephone numbers for the former Stelor employee that threatened to kill Steven Esrig, describe fully the circumstances surrounding this death threat, and identify all documents known to Stelor with information regarding this alleged threat to Esrig.

ANSWER:

61. Please describe fully Michael DiMuccio's role in managing or operating Stelor, including in your answer whether Michael DiMuccio has ever held an office in Stelor or a company affiliated with Stelor, the beginning and ending dates of any role Mr. DiMuccio has had in the operation of Stelor or a company affiliated with Stelor, his job title(s), and a description of all work he has done for Stelor.

ANSWER:

62. Please state the names, addresses, and telephone numbers of all Stelor's current or former officers, directors, managers, investors, consultants or employees that were or

are officers, managers, investors, consultants and/or employees of The Aurora Collection, Inc., and for each individual identified, please describe fully their title, duties, and responsibilities while associated with The Aurora Collection, Inc.

ANSWER:

63. Please state all facts, and the names, addresses, and telephone numbers of all witnesses that can testify to those facts, that prove or tend to prove Plaintiff's allegations that Defendants' actions actually diluted the distinctive quality of Stelor's marks.

ANSWER:

64. Please fully describe all evidence, in sufficient detail for Defendants to prepare a Request for Production, known to Stelor (including but not limited to documents and things), that proves or tends to prove Plaintiff's allegation that Defendants' actions actually diluted the distinctive quality of Stelor's markets.

ANSWER:

65. Please state the names of all business enterprises that have operated at any time from 1998 to the present at 14701 Mockingbird Lane, Darnestown, Maryland, or that have used that address as its principal office or principal place of business. For each such business enterprise identified, please also answer subparts (a) – (f).

ANSWER:

- a. Identify the state (*e.g.*, Delaware) under whose laws the business enterprise was formed

ANSWER:

- b. Fully describe the goods and services of the business enterprise and identify with specificity any goods and services that were or are marked with any of Stelor's marks.

ANSWER:

- c. Identify the officers and/or managers of the business by name, address, phone number, and office (*i.e.* president, general manager, vice president, *etc.*).

ANSWER:

- d. State the names, addresses, job titles, job descriptions, and duties of all employees of the business.

ANSWER:

- e. Identify the investors, shareholders, and/or members by name, address, and telephone number and state the amount of money each such person has invested in the business enterprise and date(s) of their investment(s).

ANSWER:

- f. State whether the business enterprise is still operating at 14701 Mockingbird Lane, Darnestown, Maryland, and if not, please state whether it is still in business, and if so, its current principal place of business

ANSWER:

66. Please state whether or not 14701 Mockingbird Lane, Darnestown, Maryland is the personal residence of Steven Esrig.

ANSWER:

67. Please identify the local zoning authority with jurisdiction over 14701 Mockingbird Lane, Darnestown, Maryland, state the zoning designation and/or classification for that property, and state whether that property is zoned for business use.

ANSWER:

68. Please identify all business or retail licenses or permits for the operation of any business enterprise that has operated or is operating at 14701 Mockingbird Lane, Darnestown, Maryland at anytime since 1998, including in your answer the name of the license or permit, the name of the issuing government agency and the license or permit number.

ANSWER:

69. Please state the date that Stelor moved its business from 14701 Mockingbird Lane, Darnestown, Maryland, to its current address of 19110 Montgomery Village Road, Montgomery Village, Maryland, 20886.

ANSWER:

70. If Stelor leases or rents the premises at 19110 Montgomery Village Road, Montgomery Village, Maryland, 20886, please state the name and business address of the landlord and/or lessor of the premises.

ANSWER:

71. Please state the name of all business enterprises that share Stelor's business office at 19110 Montgomery Village Road, Montgomery Village, Maryland, 20886.

ANSWER:

72. If Stelor owns the premises at 19110 Montgomery Village Road, Montgomery Village, Maryland, 20886, please state the date it acquired the property and the purchase price.

ANSWER:

73. Please identify in sufficient detail for Defendants to prepare a Request for Production all business records of The Googles Childrens' Workshop, Inc., a New Jersey corporation, currently in Stelor's custody or control.

ANSWER:

74. Please state the names, addresses, and phone numbers of all shareholders of The Googles Children's Workshop, Inc., a New Jersey corporation for the years 1994 through 1997.

ANSWER:

75. Please state the names, addresses, and phone numbers of all officers of The Googles Children's Workshop, Inc., a New Jersey Corporation for the years 1994 through 1997.

ANSWER:

76. Please state whether Stelor is in custody or control of any documents, including electronic documents such as e-mails or web site pages, that show that The Googles Children's Workshop, Inc., a New Jersey corporation, offered for sale the book "Googles and the Planet of Goo" or any other children's books in the years from 1994 to 1997, and if so, describe all such documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

77. Please fully describe, in sufficient detail for Defendants to prepare a Request for Production, all documents in Stelor's custody or control with information regarding the number of copies of the book "Googles from the Planet of Goo" or any other

children's book sold by The Googles Children's Workshop, Inc., a New Jersey Corporation, in the years from 1994 to 1997.

ANSWER:

78. Please state the number of copies of the book in "Googles and the Planet of Goo" and any other children's book sold by the Googles Children's Workshop Inc., a New Jersey corporation, in each year from 1994 to 1997, and for each book sold, state the date of sale, sale price, and the names, address, and phone number of the purchaser of the books.

ANSWER:

79. Please state the names of all goods or services marked with the Googles logo offered for sale by The Googles Children's Workshop, Inc., a New Jersey corporation in the years from 1994 through 1997, and for each of the goods or services identified, state the sale price, date of sale, quantity sold, and name, address, and phone number of the purchaser.

ANSWER:

80. Please state whether Stelor is in custody or control of any business records of Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group and/or The Googles Children's Workshop at 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160, in any year from 1997 through 2000, inclusive, and

if so, identify all such documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

81. Please state whether Stelor is in custody or control of any documents, including electronic documents such as e-mails or website pages, that show that Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group, and/or The Googles Children's Workshop at 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160, offered for sale the book "Googles and the Planet of Goo" or any other children's book in the years from 1997 through 2000, inclusive, and if so, describe all documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

82. Please fully describe, in sufficient detail for Defendant to prepare a Request for Production, all documents in Stelor's custody or control with information regarding the number of copies of the book "Googles and the Planet of Goo" or any other children's book sold by Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group, and/or The Googles Children's Workshop in any year from 1997 through 2000, inclusive.

ANSWER:

83. Please state the number of copies of the book "Googles and the Planet of Goo" and

any other children's book sold by Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group, and/or The Googles Children's Workshop in the years from 1997 through 2000, inclusive.

ANSWER:

84. Please state the number of "Googles the Millenium Mascot" t-shirts sold by Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group, and/or The Googles Children's Workshop at 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160, in any year from 1997 through 2000, inclusive.

ANSWER:

85. Please identify all goods and services marked with the Googles logo that were offered for sale by Steven A. Silvers, a sole proprietor doing business as SAS Entertainment Group, and/or The Googles Children's Workshop at 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160, in any year from 1997 through 2000, inclusive, and for all goods and services identified, state the date of sale, sale price, quantity sold, and the name and address of each purchaser.

ANSWER:

86. Please state whether Stelor is in possession of electronic or hard copies of the internet website pages for the googles.com website as it allegedly existed in any year from 1997 through 2000, and if so, please state the dates or the periods those web pages were posted on the Internet.

ANSWER:

87. Please identify all business records of SAS Entertainment Group, Silvers Entertainment Group, and/or Silvers Entertainment Group, Inc., in Stelor's custody or control in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

88. Please state the date when Steven Esrig first became aware of The Aurora Collection, Inc., and state the names, addresses, and phone numbers of all directors of The Aurora Collection, Inc. known to Steven Esrig at the time Esrig first became aware of The Aurora Collection, Inc.

ANSWER:

89. Please fully describe when and how Steven Esrig first came to know The Aurora Collection, Inc. directors identified in the previous interrogatory.

ANSWER:

90. Please fully describe when (the date), where, and how Steven Esrig first became acquainted with Steven A. Silvers.

ANSWER:

91. Please fully describe when (the date), where, and how Steven Esrig first became acquainted with Silvers' book "Googles and the Planet of Goo".

ANSWER:

92. Please state the names, addresses, and phone numbers of all past and present shareholders in The Aurora Collection, Inc., known to Stelor or to Steven Esrig.

ANSWER:

93. Please state the names, addresses, and phone numbers of all past and present officers and executives of The Aurora Collection, Inc., known to Stelor or to Steven Esrig.

ANSWER:

94. Please state the names, addresses, and phone numbers of all past and present employees of The Aurora Collection, Inc., known to Stelor or to Steven Esrig.

ANSWER:

95. Please state when (the date), where, and how Steven Esrig first became acquainted with the following individuals:

- a. Myles W. Farrington

ANSWER:

- b. Sandra Farrington

ANSWER:

- c. Myles C. ("M.C.") Farrington

ANSWER:

- d. Laura C. (“L.C.”) Farrington

ANSWER:

- e. Ann Rousseau

ANSWER:

- f. Dr. Ellen Gertz

ANSWER:

- g. Brian C. Blomquist

ANSWER:

96. Please state whether Steven Esrig is acquainted with the following listed individuals, and if so, please state when (the date), where, and how Esrig first became acquainted with them:

- a. Dr. Stephen Hubbell

ANSWER:

- b. Dr. Patricia Adain Gowaty

ANSWER:

97. Please state the amount of money Steven Esrig invested in The Aurora Collection, Inc., when Esrig made this investment, whether Esrig is still a stockholder in The Aurora Collection, Inc., and identify all documents with information regarding Esrig's investment in The Aurora Collection, Inc. in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

98. Please state the name and address of Steven Esrig's company that provided consulting services to The Aurora Collection, Inc., describe fully all consulting or other services provided by Esrig and/or his company to The Aurora Collection, Inc., and identify all documents and contracts in Esrig's custody or control with information regarding services provided to the Aurora Collection, Inc. by Esrig and/or his company.

ANSWER:

99. Please state whether Stelor is in custody or control of electronic or hard copies of internet web pages for the domain name theauroracollection.com website for any of the years 1999 through 2002, inclusive, and if so, state the dates or time periods such website pages were posted on the internet.

ANSWER:

100. Please state whether Stelor is in custody or control of electronic or hard copies of internet web pages for the domain name funwithscienceclub.com, and if so state the dates or time periods those web pages were posted on the internet.

ANSWER:

101. Please state the dates and locations of all performances of the Googles characters and/or of the “Goosical Musical Revue” produced or sponsored by The Aurora Collection, Inc. from 1999-2002. For each performance, please state:

- a. The name, address, and telephone number for the contact person at the venue of the performance.

ANSWER:

- b. Whether any tickets were sold, and if so, how many.

ANSWER:

- c. The purchase price of the tickets and total dollar amount of tickets sold.

ANSWER:

- d. Whether any merchandise was sold at the performance, and if so, a description of the type, quantity, and total dollar amount of merchandise sold.

ANSWER:

102. Please identify all business records of The Aurora Collection, Inc. currently in Stelor’s custody or control in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

103. Please identify all business records of The Fun With Science Club currently in Stelor's custody or control in sufficient detail for Defendants to prepare a Request for Production. .

ANSWER:

104. Please state whether Stelor is in custody or control of any documents that show that The Aurora Collection, Inc. offered for sale the book "Googles and the Planet of Goo" or any other childrens book in any year from 1999 through 2002, and if so, please identify those documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

105. Please state whether Stelor is in custody or control of any documents that show that The Aurora Collection, Inc. sold any copies of the book "Googles and the Planet of Goo" in any year from 1999 through 2002, and if so, please identify those documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

106. State the number of copies of the book "Googles and the Planet of Goo" or any other children's book if any, sold by The Aurora Collection, Inc. in any year from 1999 through 2002, and state sale price, date of sale, and the name, address and phone number of each purchaser.

ANSWER:

107. Please state whether Stelor is in custody or control of any documents that show that The Aurora Collection, Inc., offered for sale plush and stuffed toys in any year from 1999 through 2002, and if so, please identify those documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

108. Please state whether Stelor is in custody or control of any documents that show that The Aurora Collection, Inc., sold any plush and stuffed toys in any year from 1999 through 2002, and if so, please identify those documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

109. State the number of plush and stuffed toys, if any, sold by The Aurora Collection, Inc., in the years 1999 through 2002, and state the date of sale, name of purchaser, and address of the purchaser of each plush and stuffed toy.

ANSWER:

110. Please state whether Steven Esrig and/or E.G.G. International, LLC, currently provides consulting or other services to The Aurora Collection, Inc., and if so, please state the nature of those services and the name of Esrig's contact person at The Aurora Collection, Inc.

ANSWER:

111. Please state the date Steven Esrig and/or E.G.G. International, LLC last provided services to The Aurora Collection, Inc., and describe fully the services last provided to The Aurora Collection, Inc. by Steven Esrig and/or E.G.G. International, LLC.

ANSWER:

112. Please identify the goods and/or services currently offered or sold by The Aurora Collection, Inc.

ANSWER:

113. Please state the name and address of the vendor and/or distributor that provided the following goods to The Aurora Collection, Inc. for resale:

- a. Precambrium Era Rocks

ANSWER:

- b. Crystal growing kits

ANSWER:

- c. Dinosaur Excavation kits

ANSWER:

- d. Marble Hop 2000 Computer program

ANSWER:

- e. Terra Cotta Soldier Replica

ANSWER:

- f. Dab-A-Dino painting toy

ANSWER:

114. Please state the number of the following products sold by The Aurora Collection, Inc.”

- a. Precambrium Era Rocks

ANSWER:

- b. Crystal growing kits

ANSWER:

- c. Dinosaur Excavation kits

ANSWER:

- d. Marble Hop 2000 Computer program

ANSWER:

- e. Terra Cotta Soldier Replica

ANSWER:

- f. Dab-A-Dino painting toy

ANSWER:

115. Please state the number of the following products sold by The Fun with Science Club:

- a. Precambrium Era Rocks

ANSWER:

- b. Crystal growing kits

ANSWER:

- c. Dinosaur Excavation Kits

ANSWER:

- d. Marble Hop 3000 Computer program

ANSWER:

- e. Terra Cotta Soldier Replica

ANSWER:

- f. Dab-A-Dino painting toy

ANSWER:

116. Please state whether any school or school organizations signed up for the internet fund-raising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

117. Please fully describe Steven Esrig's involvement in setting up or operating internet fund raising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

118. Please fully describe Steven Silvers involvement in setting up or operating internet fundraising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

119. Please fully describe Dr. Ellen Gertz' involvement in setting up or operating internet fundraising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

120. Please fully describe Myles W. Farrington's involvement in setting up or operating internet fund raising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

121. Please fully describe Sandra Farrington's involvement in setting up or operating internet fund raising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

122. Please fully describe Myles C. ("M.C.") Farrington's involvement in setting up or operating internet fund raising program offered by The Aurora Collection, Inc. through its Fun With Science Club.

ANSWER:

123. Please state whether Stelor Productions, Inc. is still in business or whether Stelor Productions, Inc. has ceased doing business. If Stelor Productions, Inc. is still in business, please describe fully the nature of its business, including a description of its current goods and services, the names, addresses, and telephone numbers of its current officers, managers, employees and shareholders, and the address of its current principal of business.

ANSWER:

124. Please state when Stelor Productions was converted from a corporation to a limited liability company, state all reasons why Stelor Productions was converted from a corporation to a limited liability company, and state the names, addresses, and telephone numbers of all individuals with personal knowledge of this conversion.

ANSWER:

125. Please state whether Stelor Productions, Inc. offered for sale the book “Googles and the Planet of Goo” or any other children’s book in any year from 2002 through 2005 and if so, please identify all documents in Stelor’s custody or control that show that Stelor offered any children’s book for sale in those years in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

126. Please identify all documents for any sales of the book “Googles and the Planet of Goo”, or any other children’s book by Stelor Productions, Inc. in the years 2002 through 2005, in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

127. Please state how many copies of the book “Googles from the Planet of Goo” Stelor currently has in its custody or control.

ANSWER:

128. Please state how many copies of the book “Googles and the Return Flight to Goo” Stelor currently has in its custody or control.

ANSWER:

129. Please state how many copies of the book “Googles from the Planet of Goo” were sold by Stelor Productions, Inc. in the years 2002 through 2005, and for each copy sold, please state:

- a. The date of sale

ANSWER:

- b. The address of the purchaser

ANSWER:

- c. The name of purchaser

ANSWER:

- d. The address of the purchaser

ANSWER:

130. Please state whether Stelor Productions, LLC is in custody or control of any documents that show that Stelor Productions, LLC offered for sale the book “Googles and the Planet of Goo” or any other children’s book, in any year from 2005 through the present, and identify all such documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

131. Please state whether Stelor Productions, LLC is in custody or control of any documents that show that Stelor Productions, LLC has sold any copies of the book “Googles and the Planet of Goo” or any other children’s book in the years 2005 to the present, and if so, identify the documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

132. State the number of copies of the book “Googles and the Planet of Goo” sold by Stelor Productions, LLC, or any other children’s book in the years 2005 to the present, and for each copy sold, state the date of purchase, the sale price and the name and address of the purchaser.

ANSWER:

133. Please state whether Stelor Productions, LLC. is in custody or control of any documents that show Stelor Productions, LLC offered stuffed or plush toys for sale in any year from 2005 through the present, and identify all such documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

134. Please state whether Stelor Productions, LLC is in custody or control of any

documents that show that Stelor Productions, LLC has sold any stuffed or plush toys in the years 2005 to the present, and if so, identify the documents in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

135. State the number of stuffed and plush toys sold by Stelor Productions, LLC, in the years 2002 to the present, and for each stuffed or plush toy sold, state the name of the toy, the date of purchase and the name and address of the purchaser.

ANSWER:

136. Please identify all documents in Stelors custody or control in sufficient detail for Defendants to prepare a Request for Production with information regarding Stelor's offer for sale of any goods or services marked with the following alleged trademarks:

- a. Googles logo

ANSWER:

- b. the word Googles

ANSWER:

- c. Oogle

ANSWER:

d. Iggle

ANSWER:

e. Oggle

ANSWER:

137. Please identify all documents in Stelors custody or control in sufficient detail for Defendants to prepare a Request for Production with information regarding Stelor's actual sales of any goods or services marked with the following alleged trademarks:

a. Googles logo

ANSWER:

b. the word Googles

ANSWER:

c. Oogle

ANSWER:

d. Iggle

ANSWER:

e. Oggle

ANSWER

138. State the date of sale, sale price, and name and address of the purchaser for all sales of any goods or services sold by Stelor Productions, LLC, in the years 2005 to the present that were marked with any of Stelor's alleged trademarks.

ANSWER:

139. Please state how many copies of the book "Googles and the Return Flight to Goo" have been sold by Stelor Productions, Inc. or Stelor Productions, LLC, and for each copies sold, please state:

- a. The date of the sale

ANSWER:

- b. The sale price

ANSWER:

- c. The name of purchaser

ANSWER:

- d. The address of purchaser

ANSWER:

140. Please state the date that Stelor first offered Googles music for sale on I-Tunes.

ANSWER:

141. For each sale of Googles music on I-Tunes, please state:

- a. The name of the song or CD sold.

ANSWER:

- b. The purchase price

ANSWER:

- c. The date of the sale.

ANSWER:

- d. The name and address of the purchaser.

ANSWER:

142. Please state the total dollar amount of sales of Googles music on I-Tunes since the date Stelor first offered music for sale on I-Tunes.

ANSWER:

143. Please state the dates and locations of all performances of the Googles characters and/or of the “Goosical Musical Revue“ produced or sponsored by Stelor Productions, Inc. and/or Stelor Productions, LLC from 2002 to the present.

- a. The name, address, and telephone number for the contact person at the venue of the performance.

ANSWER:

- b. State the name(s) of the individual(s) at Stelor that produced, scheduled, and supervised the performance(s).

ANSWER:

- c. Whether any tickets were sold, and if so, how many.

ANSWER:

- d. The price of the tickets, and total dollar amount of tickets sold.

ANSWER:

- e. Whether any merchandise was sold at the performance, and if so, please give a full accounting of the name, quantity, and total dollar amount of the merchandise sold.

ANSWER:

144. Please state whether Stelor Productions, Inc., and/or Stelor Productions has produced or created any television episodes, including cartoons, featuring any Googles character, and if so, please state the name(s) of the individuals that produced the television episodes, the date(s) the episode(s) were completed, and describe the television episodes in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

145. Please state whether The Aurora Collection, Inc. has produced or created any television programming, including cartoons, featuring any Googles character, and if so, please state the name(s) of the individuals that produced the television programming and describe the television programming in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

146. Please state the date, time, channel, and television station for each and every episode aired on network or cable television of the Googles characters in cartoons, television programs, commercials, or promotions of the Googles characters.

ANSWER:

147. Please state the names of all of Stelor's licensees and/or sub-licensees of Googles trademarks, Googles merchandise, Googles services, and/or Googles television or internet programming, and for each licensee or sub-licensee, state the following:

ANSWER:

- a. The name, address, and telephone number of the licensee or sub-licensee

ANSWER:

- b. The name and telephone number of the contact person for the licensee that dealt with Stelor

ANSWER:

- c. A description of the Googles property that was or is licensed

ANSWER:

- d. The terms and conditions of the license of sub-license agreement, including, but not limited to the amount of money and royalties paid or to be paid to Stelor

ANSWER:

148. For each current employee of Stelor Productions, LLC, please state their name, address, home address, phone number, job title, job description, and the date each such employee started work at Stelor Productions LLC..

ANSWER:

149. For each current officer and/or manager of Stelor Productions, LLC, please state their name, home address, phone number, office, (i.e. president, general manager, vice president, etc.), and date each such officer or manager assumed the office or management position at Stelor Productions, LLC.

ANSWER:

150. For each current member, sub-member, and/or equity owner of Stelor Productions LLC, please state their name, home address, phone number, and date each such

person became a member, sub-member, and/or equity owner of Stelor Productions LLC, and the amount of money each such member, sub-member, and/or equity Owner has contributed to Stelor Productions, LLC.

ANSWER:

151. Please state the date that Stelor's "GooShop" at googles.com went live on the Internet.

ANSWER:

152. Please state Stelor's current inventory (number of units) Stelor has in its possession of the following goods:

- a. Book "Googles and the Planet of Goo", Item No. GB 0001

ANSWER:

- b. Google t-shirt, Item No. GB 001

ANSWER:

- c. Oogle toy, Item No. PST 001

ANSWER:

- d. Oggle toy, Item No. PST 002

ANSWER:

- e. Iggle toy, Item No. PST 003

ANSWER:

- f. Goo Boo toy, Item No. PST 004

ANSWER:

- g. Goo Roo toy, Item No. PST 005

ANSWER:

- h. “One Goo World” compact disc, Item No. GMCD 001

ANSWER:

- i. “Un Goo Mundo” compact disc, Item No. GMCD 002

ANSWER:

- j. Google stickers, Item No. GST001

ANSWER:

- 153. Please state why an Oogle toy is not offered for sale on the internet in Stelors Goo Shop.

ANSWER:

- 154. Please state the name, address, and phone number of the vendor or manufacturer that makes Googles t-shirts for resale by Stelor.

ANSWER:

155. Please state the name, address, and phone number of the vendor or manufacturer that makes Oogle, Oggle, Iggle, Goo Boo, and Goo Roo toys for resale by Stelor.

ANSWER:

156. Please state the name, address, and phone number of the vendor or manufacturer that makes “Goo World” compact discs for resale by Stelor.

ANSWER:

157. Please state the name, address, and phone number of the vendor or manufacturer that makes Googles stickers for resale by Stelor.

ANSWER:

158. For any actual sales of the following goods by Stelor, please state the date of sale, sale price, and name and address of the purchaser

- a. Book “Googles and the Planet of Goo”, Item No. GB 0001

ANSWER:

- b. Google t-shirt, Item No. GB 001

ANSWER:

- c. Oogle toy, Item No. PST 001

ANSWER:

- d. Oggle toy, Item No. PST 002

ANSWER:

- e. Iggle toy, Item No. PST 003

ANSWER:

- f. Goo Boo toy, Item No. PST 004

ANSWER:

- g. Goo Roo toy, Item No. PST 005

ANSWER:

- h. “One Goo World” compact disc, Item No. GMCD 001

ANSWER:

- i. “Un Goo Mundo” compact disc, Item No. GMCD 002

ANSWER:

- j. Google stickers, Item No. GST001

ANSWER:

159. Please state whether Stelor has maintained electronic or hard copies of superceded or obsolete web pages for googles.com for the years 2002 to present, and if so,

describe the date of the googles.com web pages Stelor has maintained and describe those web pages in sufficient detail for Defendants to prepare a Request for Production.

ANSWER

160. Please state the name and addresses of each computer programmer, web designer, or web master that created or modified Stelor's googles.com website, in the months from June through December, 2002.

ANSWER:

161. Please state the name and addresses of each computer programmer, web designer, or web master that created or modified Stelor's googles.com website, in the months from January 2008 through the date of answering these interrogatories.

ANSWER:

162. Please describe fully all of the services that Spinning Doors, Inc. has performed for Stelor, including in your answer the dates of the services and the name(s) of the Spinning Doors personnel that performed the services.

ANSWER:

163. Please state the name, current address, and current phone number of the creator of "The Troodles from Troo".

ANSWER:

164. Please state the name, address, and telephone number of Robert Morse and describe fully Mr. Morse's relationship to or involvement with Stelor. Please include in your answer whether or not Mr. Morse is a lawyer.

ANSWER:

165. Please state the name, address, and telephone number of John Neubauer, and describe fully Mr. Neubauer's relationship to or involvement with Stelor.

ANSWER:

166. Please state the name, address, and telephone number of Creative Network Innovations ("CNI"), describe CNI's relationship to or involvement with Stelor, and describe fully all disputes between CNI and Stelor, including in your answer the case name, court name and cause number for any disputes involving litigation.

ANSWER:

167. Please state the names and dates of all industry trade shows attended by a representative of Stelor to promote the Googles brand or Googles goods or services from 2002 to the present, and for each such industry trade show so attended, please state:

ANSWER:

- a. The name, address, and telephone number of the Stelor employee(s) or representative(s) attending the industry trade show

ANSWER:

- b. Whether Stelor had a booth and/or display at the trade show, and if so, the names(s) of the Stelor employee(s) and representative(s) that staffed the booth or display

ANSWER:

- c. Whether Stelor sold or licensed any goods or services at the trade show, and if so, please describe the goods or services sold or licensed and state the name, address, and the telephone number of the purchaser or licensee of the goods or services

ANSWER:

168. Please state whether Stelor Productions, Inc. hired attorney Ira Edell to prepare a Section 8/15 Affidavit that was filed on or about March 2003 to renew the Googles logo trademark.

ANSWER:

169. Please describe fully all information known to Stelor that The Googles Children's Workshop, Inc., a New Jersey corporation was doing business at P.O. Box 60210, Potomac, MD 20859 in the five years from August 12, 1997 through August 12, 2002.

ANSWER:

170. Please state all evidence known to Stelor that the Googles logo was in continuous use as a trademark on or in connection with children's books for more than five years from August 12, 1997

ANSWER:

171. Please state the case name and case number, for all trademark opposition proceedings initiated by Stelor or by Steven A. Silvers regarding Stelor's marks.

ANSWER:

172. Please state the case name and case number, for all domain name proceedings initiated by Stelor or by Steven A. Silvers regarding Stelor's marks.

ANSWER:

173. Please state the case name and case number, for all lawsuits initiated by Stelor or by Steven A. Silvers regarding Stelor's marks.

ANSWER:

174. Please state whether Steven Esrig ever visited The Aurora Collection, Inc., at 4651 S.W. 51st St., Ste. 807, Davie, FL 33314, and if so, please state:

- a. A complete description of building or structure corresponding to the above address, *i.e.*, whether it is in a strip center, office building, apartment, house, etc.

ANSWER:

- b. The dates that Esrig visited that location

ANSWER:

- c. The names of the people that Esrig met with on those visits

ANSWER:

- d. The names of any other businesses that were operating at that address at the time of Esrigs' visit(s)

ANSWER:

175. Please state whether Steven Esrig ever visited Steven A. Silvers at 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160, and if so, please state:

- a. A complete description of building or structure corresponding to the above address, *i.e.*, whether it is in a strip center, office building, apartment, house, etc.

ANSWER:

- b. The dates that Esrig visited that location

ANSWER:

- c. The names of the people that Esrig met with on those visits

ANSWER:

- d. The names of any other businesses that were operating at that address at the time of Esrigs' visit(s)

ANSWER:

176. Please state whether 3741 N.E. 163rd St., Ste. 325, North Miami Beach, FL 33160 is or was Steven A. Silvers' personal residence.

ANSWER:

177. Please state whether Steven Esrig ever visited Steven A. Silvers at 8983 Okeechobee Blvd., Suite 202, PMB 203, West Palm Beach, FL 33411, and if so, please state:

- a. A complete description of building or structure corresponding to the above address, *i.e.*, whether it is in a strip center, office building, apartment, house, etc.

ANSWER:

- b. The dates that Esrig visited that location.

ANSWER:

- c. The names of the people that Esrig met with on those visits.

ANSWER:

- d. The names of any other businesses that were operating at that address at the time of Esrigs' visit(s).

ANSWER:

- 178. Please state whether 8983 Okeechobee Blvd., Suite 202, PMB 203, West Palm Beach, FL 33411, is or was Steven A. Silvers' personal residence.

ANSWER:

- 179. Please provide a summary of the testimony that Stelor expects the following witnesses to give in the case of *Stelor Productions, LLC v. Google, Inc.*, Case No. 05-80387, pending in U. S. District Court for the Southern District of Florida:

- a. Steven Esrig

ANSWER:

- b. Joseph Matos

ANSWER:

- c. Ira Edell

ANSWER:

- d. Representatives of The Aurora Collection, Inc.

ANSWER:

- e. John F. Maitland

ANSWER:

- f. Steven Silvers

ANSWER:

- g. Marsh Genaro

ANSWER:

- 180. Please provide the following information with respect to the testimony that Stelor expects Gary Krugman to give in the case of *Stelor Productions, LLC v. Google Inc.*, Case No. 05-80387, pending in the U. S. District Court for the Southern District of Florida:

- a. a complete statement of all opinions to be expressed and the basis or reasons therefore
- b. the data or information considered by the witness in forming the opinions
- c. any exhibits to be used as a summary of or support for the opinions
- d. the qualifications of the witness, including a list of all publications authored by the witness within the preceding 10 years
- e. the compensation to be paid for the expert's study and testimony; and

- f. a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

ANSWER:

181. Please provide the following information with respect to the testimony that Stelor expects Professor David J. Franklyn to give in the case of *Stelor Productions, LLC v. Google Inc.*, Case No. 05-80387, pending in the U. S. District Court for the Southern District of Florida:

- a. a complete statement of all opinions to be expressed and the basis or reasons therefore
- b. the data or information considered by the witness in forming the opinions
- c. any exhibits to be used as a summary of or support for the opinions
- d. the qualifications of the witness, including a list of all publications authored by the witness within the preceding 10 years
- e. the compensation to be paid for the expert's study and testimony; and
- f. a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

ANSWER:

182. Please provide the following information with respect to the testimony that Stelor expects James Fitzimmons to give in the case of *Stelor Productions, LLC v. Google Inc.*, Case No. 05-80387, pending in the U. S. District Court for the Southern District of Florida:

- a. a complete statement of all opinions to be expressed and the basis or reasons therefore
- b. the data or information considered by the witness in forming the opinions
- c. any exhibits to be used as a summary of or support for the opinions
- d. the qualifications of the witness, including a list of all publications authored by the witness within the preceding 10 years
- e. the compensation to be paid for the expert's study and testimony; and
- f. a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

ANSWER:

183. Please provide the following information with respect to the testimony that Stelor expects Micheal Elkin to give in the case of *Stelor Productions, LLC v. Google Inc.*, Case No. 05-80387, pending in the U. S. District Court for the Southern District of Florida:

- a. a complete statement of all opinions to be expressed and the basis or reasons therefore
- b. the data or information considered by the witness in forming the opinions
- c. any exhibits to be used as a summary of or support for the opinions
- d. the qualifications of the witness, including a list of all publications authored by the witness within the preceding 10 years

- e. the compensation to be paid for the expert's study and testimony; and
- f. a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

ANSWER:

184. State the name and address of the prospective licensees and the name, address, and phone number of the individuals with whom Stelor was allegedly negotiating in 2004 according to Steven Esrig's testimony at pages 49, 50, and 52 of his testimonial deposition in the matter of *Stelor Production, Inc. v. Kevin Mendell*, Opposition No. 91157879, pending before the Trademark Trial and Appeal Board, including, but not limited to the prospective licensees Esrig described as follows:

- a. A company that produces direct to video animation cartoon
- b. One of the largest manufacturers of paper good birthday party children's theme party products in the world
- c. Food Associations
- d. Dry Cleaners
- e. The plethora of licensees that have come to us [Stelor Productions] to see the Googles from Goo.

ANSWER:

185. Please state whether or not any of the prospective licensees identified in response to the previous interrogatory entered into a license agreement with Stelor, and if so, state the date of the agreement, the names of the parties to the agreement, the

terms and conditions of the agreement, the amount of money Stelor was to be paid pursuant to the agreement in Stelor's custody or control in sufficient detail for Defendants to prepare a Request for Production.

ANSWER:

186. State the name and address of the twelve (12) or (13) prospective licensees and the name, address, and phone numbers of the individuals with whom Stelor was allegedly negotiating in 2005 as attested to by Steven Esrig in his Second Supplemental Declaration which is an exhibit to Document 148, the Appendix of Exhibits to Motion for Summary Judgment, filed in the case of *Silvers v. Google, Inc.*, Case No. 05-80387, pending in the U. S. District Court for the Southern District of Florida, including, but not limited to the prospective licenses described by Esrig as follows:
- a. Major children's entertainment conglomerate
 - b. Nationally recognized sporting goods company
 - c. Major manufacturer of bedding/home products
 - d. Consumer goods packaging company
 - e. Fortune 500 toy manufacturing company
 - f. Major trading card company
 - g. International candy company
 - h. Major cereal company
 - i. Fortune 500 personal hygiene company
 - j. Major manufacturer of educational supplies

- k. Major children's event
- l. Large food association

ANSWER:

**I AFFIRM UNDER THE PENALTIES FOR PERJURY THAT THE FOREGOING
ANSWERS ARE TRUE AND CORRECT.**

Printed Name

Signature
Authorized officer
Stelor Productions, LLC.

Respectfully submitted by:

Stephen L. Vaughan, #2294-49
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Indianapolis, IN 46204
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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2008, a copy of the foregoing Second Interrogatories to Plaintiff by Oogles n Googles Franchising LLC was sent via US mail, postage prepaid, to the below listed counsel of record.

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