

VAL MANDEL, P.C.

Val Mandel
Member of NY, NJ and DC Bars
e-mail: vm@valmandel.net

80 Wall Street, Suite 1115
New York, NY 10005
(212) 668-1700
Fax (212) 668-1701

Eric Wertheim
Member of NY and NJ Bars
e-mail: ew@valmandel.net

Daniel Akselrod
Member of NY Bar
e-mail: da@valmandel.net

March 5, 2010

VIA ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Vadim Mikhlyn, Inga Mikhlyn and ABC All Consulting, Inc. v. Ana Bove, Polina Dolginov, et al.**
Docket No.: 08 CIV. 3367

Dear Judge Reyes:

Plaintiffs submit this letter pursuant to Your Honor's instructions during the telephone conference held on January 26, 2010. The letter was supposed to be a joint effort of the parties but the parties could not agree on the language of the joint letter.

DOCUMENTS DUE FROM PARTIES

Unfortunately, document discovery has not moved forward at all, despite the most recent discovery extension Your Honor generously granted during the telephone conference on January 26. Despite defendant's acknowledgment that they were in possession of a list of missing items from their production for months now, defendants have never responded to the list in writing or produced any of the documents that are missing.

Likewise, despite defendants' assertion (going back to the preceding, face to face conference with Your Honor on December 22, 2010) that they were preparing a list of documents claimed to be owed by plaintiffs, no such list has ever been submitted to plaintiffs.

Honorable Ramon E. Reyes, Jr.
March 5, 2010
Page 2

DEPOSITIONS

None of the five party depositions have been completed. Defendants have ignored several of our communications about scheduling those depositions. One non-party deposition, that of Eugene Sakirski, went forward on March 1, 2010, in a cooperative manner.

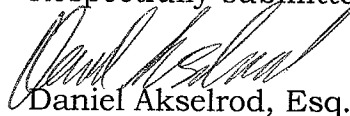
SUBPOENAS DUCES TECUM

Plaintiffs have turned over to defendants copies of all of the documents they have received in response to their recent (post November 2009) subpoenas. Defendants have not turned over a single document obtained pursuant to their 21 most recent subpoenas, although we have reminded them to do so.

DISCOVERY EXTENSION

The plaintiffs strenuously object to defendants' request for another extension to discovery in this matter.

Respectfully submitted,


Daniel Akselrod, Esq.

DA/st