

May 28, 2010

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

RECEIVED
IN CHAMBERS OF
HON. RAMON E. REYES, JR.
JUN 01 2010

DOCKET & FILE

TIME A.M. _____
P.M. 12:30 p.m.

Re: Index No. CV 08 3367
Vadim Mikhlyn, et al. v. Ana Bove, et al.

Dear Judge Reyes:

I, Anna Bove, as well as Polina Dolginov, are defendants in current case. As you know, our attorney, who represented us in this case, Levisohn Berger firm, on 05.25.10 requested permission to formally withdraw as counsel.

On May-25-2010 Mr. Peter Berger sent you an appropriate letter, which also outlined some issues of the case itself. Please, consider this letter as our motion for Pro Se, and also as our statement regarding the essence of this case.

Below we cite some paragraphs from this letter of Mr. Berger, with our additions:

From Mr. Berger's letter: "To my knowledge, the defendants, Ana Bove and Polina Dolginov and their group have provided all of the documents and discovery that their attorney Mr. Kogan had requested. There is nothing further they can supply."

From Mr. Berger's letter: "Neither I nor the defendants are aware of the alleged gaps in discovery production."
"...defendants are not familiar with the details of the process, but have only responded to Mr. Kogan's demands."

Ana Bove: We'd like to add that all disputed events in this case happened within the time period of end 2002 - March 2008. All of the documents demanded from us for this time period, were provided by us to Mr. Kogan, and by him accordingly to plaintiffs, yet in the middle/end of 2009. However, Mikhlyns attempt to prolong and confuse the case, by asking for more and more documents related to things that occurred after they took away our business, allowing time and effort on things that have nothing to do with the center of the case, and also to demand providing, checking and classifying by our lawyers, of all the Attorney-Client-Privilege and Trade-Secret documents, related to another business. Besides that, since defendants are located in different places, the number of such documents and their

re-sendings to each other is very big. Nevertheless, we're certain that we transferred all that was required, to Mr. Kogan.

We have no idea what is wrong about discovery because Mr. Kogan has handled everything himself, but we're sure that all of this prolongs the case more and more.

Already 2 years and 2 months past (since April 1 2008), since Plaintiffs have taken away our successful business, nourished for many years - with all of it's warehouses, merchandize and other property, and also with all of it's money on different accounts. Did they have the right to do so?

For already 2 years and 2 months past Plaintiffs keep infringing upon my copyrights, by selling designs which I, and other people working with me, created, including even those that were created by us a long time before we started using Plaintiffs' services. Do they have the right to do so?

Although we're absolutely sure about our rightness, and in our success on trial, we've numerous times asked Mr. Kogan, and also Vladimir Godshtern Esq., to arrange us negotiations with Plaintiffs. Plaintiffs stated that they're ready only for informal negotiations. However, as we know, all of these attempts were unsuccessful. And the recent attempt of Mr. Berger wasn't successful either.

From Mr. Berger's letter: "

This case, in essence, is very simple as defendants have pled it. Defendants ran a business in which plaintiffs worked, and plaintiffs gained control of the passwords, bank accounts and all else and threw defendants out of the business and out of control of the money. Defendants have had to fight this legal battle without money, without an ongoing business while plaintiffs have had the benefit of utilizing the assets of the business as well as having a going business with substantial regular income. Needless to say, defendants have been materially prejudiced, and when Judge Sifton did not grant a preliminary injunction, plaintiffs' have only benefited by the passage of time with their continued use of defendants' money and assets. The more complex and expensive this case became, the more likely plaintiffs would succeed not because of their right but because of their undeserved financial position.

I write this in an effort to ask that this case get to a jury as soon as possible. To my knowledge the outstanding discovery is unrelated to the central issues in this

matter, as the central issues have had all discovery produced, and all that remains are peripheral questions. The more time that is spent on peripheral questions and further discovery, the more likely defendants will never get their day in court.

I would ask that any decision on pending sanctions motions against defendants be held under consideration pending the outcome of the trial and that if, as defendants believe, their position is vindicated plaintiffs will, for the first time, suffer the consequences of their alleged improper taking.

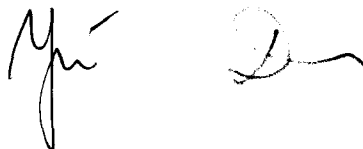
I am aware this letter is sent with a bias, and it is a bias that is founded upon my early work in the case and the continued observation of the defendants' plight."

From Mr. Berger's letter: "To the extent there are corporate defendants remaining without representation, I would ask that no judgment be entered until after the trial. Thank you for your consideration."

Ana Bove: Dear Judge Reyes, we ask and beg you not to allow injustice to be made, which can happen if this case will end without a trial decision.

Thank you for your consideration.

Respectfully submitted,
Ana Bove, Polina Dolginov

The block contains two handwritten signatures in cursive. The signature on the left is for Ana Bove, and the signature on the right is for Polina Dolginov.