

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MIKHLYN, et al,

Plaintiffs,

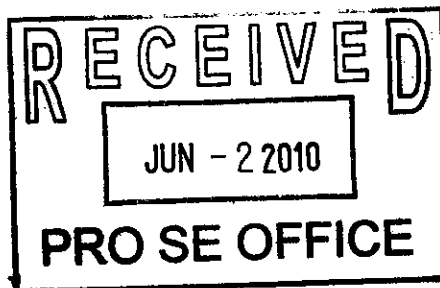
-against-CV ( 08-CV-3367 )

BOVE, et al,

Defendant(s).  
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08-CV-3367

**APPLICATION FOR THE COURT  
TO REQUEST COUNSEL**



1. Name of applicant  
Polina Dolginov

2. Explain why you feel you need a lawyer in this case. (Use additional paper if necessary.)

- I am unfamiliar with court procedures and pre-trial requirements
- My verbal English is limited
- I live abroad, and can't stay in New York for long, to represent myself effectively.
- I am a Defendant. This lawsuit was initiated against me.
- I believe that Plaintiffs have taken away my property, and used my money to hire qualified lawyers against me, putting me into a great initial disadvantage. That's why I feel a qualified attorney is necessary.

P.S.

I and my ex-partner Ms. Anna Bove (who is another defendant in this action), feel that perhaps a single attorney is enough for both of us. Ms. Anna Bove has also filed a similar form, simultaneously with me.

P.S. #2

Perhaps we'd be able to pay a small fee upfront, and some sort of contingency compensation.

P. S. #3

Please, help. This is really urgent... We're without a lawyer, in a middle of legal battle.

3. Explain what steps you have taken to find an attorney and with what results. (Use additional paper if necessary.)

Ms. Ana Bove, another Defendant in this action, made several attempts to find a pro-bono or inexpensive attorney in Brooklyn for both of us, with no result. She contacted the following law firms and organizations:

NYCLA, Legal Aid Society, Brooklyn Bar Association, LSNY, New York City Bar, MFY Legal Services, CAMBA, Valeriy Kleyman Esq, Ilya Novofastovsky. The last two attorneys (who are Russian-speaking) asked a large amount of money upfront.

4. If you need a lawyer who speaks in a language other than English, state what language you speak:

Russian

5. I understand that if a lawyer volunteers to represent me and my lawyer learns that I can afford to pay for a lawyer, the lawyer may give this information to the Court. I understand that if the Court grants this application in a complaint against the Commissioner of Social Security, the pro bono attorney, if successful, has the statutory right to request that the Court award a fee of up to 25% of the accrued Social Security or Supplemental Security Income Benefits. See 42 U.S.C. § 406.

6. I understand that if my answers on my Request to Proceed *In Forma Pauperis* are false, my case may be dismissed.

7. **I declare under penalty of perjury that the forgoing is true and correct.**

Dated: June 01, 2010

Polina  
Dolginov

Digitally signed by Polina Dolginov  
DN: CN = Polina Dolginov, C = U,  
Reason: I have reviewed this  
document  
Date: 2010.06.01 21:05:10 +0200

\_\_\_\_\_  
*Signature*

rev. 7/08  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MIKHLYN, et al,

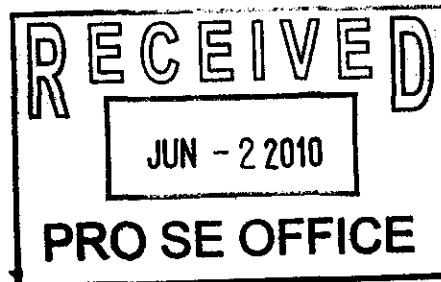
Plaintiffs,

**REQUEST TO PROCEED  
IN FORMA PAUPERIS  
IN SUPPORT OF THE Defendants,  
APPLICATION FOR THE COURT  
TO REQUEST COUNSEL**

-against-CV ( 08-CV-3367 )

BOVE, et al,

Defendant(s).  
-----X



I, Polina Dolginov (print or type your name) am the defendant in the above-entitled case and I hereby request to proceed *in forma pauperis* and without being required to prepay fees or costs or give security. I state that because of my poverty I am unable to pay the costs of said proceeding or give security therefor, and that I believe I am entitled to redress.

1. If you are presently employed, give the name and address of your employer and state the amount of earnings per month.  
I work in Fusion store (earlier called Speedo) (address: Bilu Center, Rehovot, Israel).  
Average monthly salary - around \$500.

2. If you are not presently employed, state the date you were last employed and your earnings per month at that time. **You must answer this question even if you are incarcerated.**

3. Have you received, within the past twelve months, any money from any source? If so, name the source and the amount of money you received.

a) Are you receiving any public benefits? **No**

b) Do you receive any income from any other source? **No**

4. Do you have any money, including money in a checking or savings

account? If so, how much?

**Around \$1000, on checking account.**

5. Do you own any apartment, house or building, stocks, bonds, notes, automobiles or other valuable property? If the answer is yes, describe the property and state its approximate value. **No**

(I believe that Plaintiffs have control over my property. I'm not qualified to adequately estimate it's value).

6. Do you pay for rent or for a mortgage? If so, how much each month? **No**

7. List the person(s) that you pay money to support and the amount you pay each month.

None

8. State any special circumstances which the Court should consider.

- I and my ex-partner Ms. Anna Bove (who is another defendant in this action), feel that perhaps a single attorney is enough for both of us. Ms. Anna Bove has also filed a similar form, simultaneously with me.

- Perhaps we'd be able to pay a small fee upfront, and some sort of contingency compensation, in case we get some money back from Plaintiffs.

- Please, help. This is really urgent... We're without a lawyer, in a middle of legal battle.

I understand that the Court may dismiss this case if I give a false answer to any question in this declaration.

I understand that if the Court grants this application in a complaint against the Commissioner of Social Security, the pro bono attorney, if successful, has the statutory right to request that the Court award a fee of up to 25% of the accrued Social Security or Supplemental Security Income Benefits. See 42 U.S.C. § 406.

**I declare under penalty of perjury that the foregoing is true and correct.**

Dated: JUNE 01, 2010

**Polina  
Dolginov**

Digitally signed by Polina  
Dolginov  
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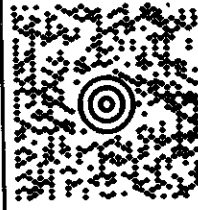
*Signature*

# s Hard Pak

ANA BOVE  
347702408  
ATTN: ANA BOVE  
2100 E 21<sup>ST</sup> ST  
BROOKLYN NY 11229

1 LBS PAK 1 OF 1

SHIP TO:  
EASTERN DISTRICT OF NEW YORK  
UNITED STATES DISTRICT COURT  
225 CADMAN PLAZA EAST  
BROOKLYN NY 11201-1804

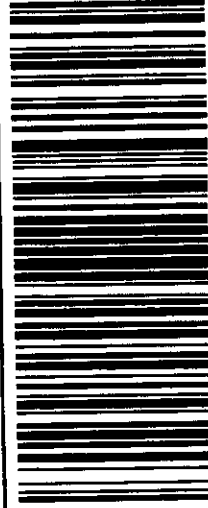


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