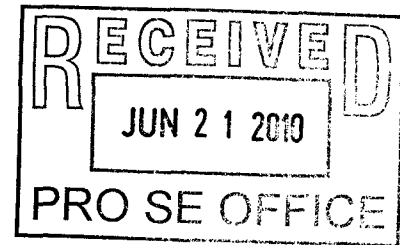


# ORIGINAL

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



**June 21, 2010**

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

Dear Judge Reyes:

We (Anna Bove and Polina Dolginov) are Pro Se defendants in current case.

Once briefly looking through over 300 pages of documents (of the default judgment motion, that were sent to us by Plaintiffs' attorneys), and after consulting with the Pro Se office about the appropriate way to respond, we see that the briefing schedule time that was offered to us, is too short for our circumstances. We're sure that we will need more time, because:

- 1) - We don't know English well enough, and this takes a lot of time for accurate translation and understanding.
- 2) - We don't know many terms, and are forced to spend additional time to get clear about the new questions that pop up all the time.
- 3) - A portion of important documents is new to us - we've never seen them before, and their importance requires detailed examination and understanding. We've counted on the Kogan firm, who completely handled the discovery process, and as it appears, it didn't bother to let us know about many things that happened during these two years. For example, this is the first time we've seen Your Honor's warning about possible default judgment, issued yet in March 6, 2010. Now we see many things in a totally different way.
- 4) - The vast majority of facts and issues outlined in the motion, are known only to Mr. Kogan, and only he can respond to them. All the Documents regarding Discovery, and regarding our case, are still located in the Kogan firm. Because we're sure that namely the Kogan firm should respond to most of Plaintiffs' issues, that's exactly how it will be. Now we have to study many documents that are unfamiliar to us, too.
- 5) - Plaintiffs keep throwing more and more new documents at us, including motions and requests to you, Your Honor, and will obviously

continue doing so, and we will have to respond. This will take additional time. We understand that Plaintiffs keep using this strategy, as earlier, in order not to allow the case into jury trial. But we very much hope that they won't succeed.

6) - We don't have enough money to hire and pay to assistants (translators, attorneys, experts), since all the money and material resources that were being accumulated for years, were grasped by Plaintiffs, and they're using our money against us.

Due to the outlined above, we suggest the following briefing schedule regarding the Rule 37 sanctions motion:

Our response to Plaintiffs' motion - by August 20, 2010.

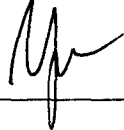
Their response to our response - by August 27, 2010.

Your Honor, we very much request you not to rule any decisions regarding the "Rule 37 sanctions motion", before we respond to Plaintiffs' motion. Thank you for your consideration.

- We also wonder if we should wait for Your Honor's clarification regarding the situation with David Binson. Mr. Binson is officially listed as an attorney for Defendant corporations. Will he keep staying the corporate attorney for Anna Bove Company, LLC and Anna Bove Embroidery Supplies, Inc further? Should there be a meeting with Mr. Kogan and Mr. Binson?

- And also - can we expect that Your Honor will indicate anytime soon, if you will reserve the decision about the technical default vs. the corporations, until after the jury verdict?

Respectfully submitted,  
Anna Bove, Polina Dolginov



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Dated:

June 21, 2010

CC: Val Mandel