

ORIGINAL

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

September 1, 2010

Re: Index No. CV 08 3367

Vadim Mikhlyn, et al. v. Ana Bove, et al.

Dear Judge Reyes:

We (Ana Bove and Polina Dolginov) are Pro Se defendants in this action.

Due to the extension that Your Honor granted us for filing our responses for Plaintiffs' "[130] Motion for Sanctions and Default Judgment", with Your Honor's permission, we'd like to make the below-stated addition to our "Opposition for Plaintiffs' Motion for Sanctions and Default Judgment" (filed by us on 08.20.10.).

An addition to Point #7 (page 44) of our response to Plaintiffs' "[130] Motion for sanctions and default judgment)":

Plaintiffs wrote:

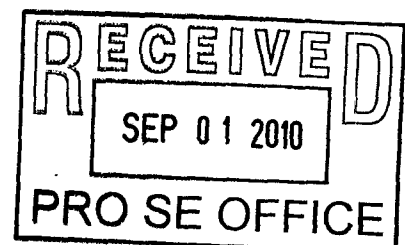
"In addition to any other relief the Court deems appropriate, defendants' improper, blanket designation of the entire June 1 production as "attorneys eyes only" should be stricken."

Your Honor, we respectfully request Your Honor not to remove the "attorneys eyes only" designation from the entire documents production, which was provided to Plaintiffs by the Kogan firm on June 1. We're requesting this due to the following reasons:

1 - Plaintiffs request to open the entire "June 1" production (all of the documents), among which there may be documents that are "attorney eyes only", and also "attorney client privilege" papers. Therefore, such a disclosure can cause significant damage to Defendants.

2 - We don't have a list of these documents, and therefore we can't respond in detail now regarding each of these documents, which one and how should be protected. Mr. Kogan didn't provide us this list, and Plaintiffs mentioned only a few documents, with obviously accidental errors in such designation.

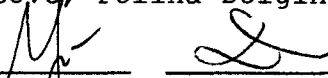
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3 - Namely the Kogan firm handled the verification of "attorneys eyes only" designation, and eventually determined this status, by their own understanding.

We respectfully request Your Honor not to remove "attorneys eyes only" before Plaintiffs provide us a full list of these documents, with specification of the reasons to remove a designation, or until we receive all of the information regarding June 1, 2010 production from the Kogan firm. To implement this, we send a letter-motion to Your Honor, to "assist obtaining documents from the Kogan firm".

Respectfully submitted,
Ana Bove, Polina Dolginov



September 1, 2010

Dated:

cc: Val Mandel