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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

VADIM MIKHLYN, INGA MIKHLYN, and
ABC ALL CONSULTING, INC.

Plaintiffs

-against-

ANA BOVE, POLINA DOLGINOV
ANNA BOVE COMPANY, LLC,
ANA BOVE COLLECTIONS, INC.
and ANNA BOVE EMBROIDERY SUPPLIES, INC.

Defendants.

ANA BOVE, ANNA BOVE COMPANY, LLC, and
ANNA BOVE EMBROIDERY SUPPLIES, INC.,

Counter-Plaintiffs,

-against-

VADIM MIKHLYN, INGA MIKHLYN and
ABC ALL CONSULTING, INC.,

Counter-Defendants.

**REPLY DECLARATION OF DANIEL AKSELROD IN FURTHER SUPPORT OF
PLAINTIFFS' MOTION FOR SANCTIONS PURSUANT TO RULE 37 AND A
DEFAULT JUDGMENT PURSUANT TO RULE 55**

Daniel Akselrod declares the following to be true under
penalty of perjury.

1. I am associated with Val Mandel, P.C., attorneys for Plaintiffs. I make this reply declaration in further support of Plaintiffs' Motion for Sanctions Pursuant to Rule 37 of the Federal Rules of Civil Procedure and for a default judgment pursuant to Rule 55 of the Federal Rules of Civil Procedure.

2. Annexed hereto as Exhibit 1 is a copy of an e-mail from me to Boris Kogan, Esq., dated March 9, 2010. Defendants never responded.

3. Annexed hereto as Exhibit 2 is a copy of my letter to Boris Kogan, Esq. dated April 6, 2010, which covered our production of a CD-Rom containing plaintiffs' QuickBooks.

4. Annexed hereto as Exhibit 3 are copies of three letters we received in response to subpoenas we served in an effort to obtain defendants' Israeli bank records.

5. Annexed hereto as Exhibit 4 are excerpts from the transcript of the pretrial conference held on June 18, 2009.

6. Annexed hereto as Exhibit 5 are excerpts from the deposition transcript of Alexandr Sakirski, taken on December 10, 2009.

7. Annexed hereto as Exhibit 6 is a copy of an email from Tatiana Skovish to Alexandr Sakirski, dated December 24, 2009, with a screenshot of an open Microsoft Excel file attached thereto and printouts of that file.

8. Annexed hereto as Exhibit 7 are excerpt from the deposition transcript of Tatiana Skovish, taken on November 25, 2009.

9. Annexed hereto as Exhibit 8 is an e-mail from Microsoft Online Customer Service to Vadim Mikhlyn, dated September 14, 2010, explaining how MSN chats are logged on a computer.

10. Annexed hereto as Exhibit 9 is a printout of a computer screen produced by defendants in the course of discovery.

11. Annexed hereto as Exhibit 10 are excerpts from the deposition transcript of Ana Bove, taken on November 24, 2009.

12. Annexed hereto as Exhibit 11 is a copy of a letter from Boris Kogan, Esq. to Eric Wertheim, Esq., dated May 12, 2009.

13. Annexed hereto as Exhibit 12 is an e-mail from abc.all@fusemail.com to vadinga@hotmail.com, dated June 22, 2007, a copy of the attached MSN chat (as it was used on Polina Dolginov's deposition, hence the "Exhibit 12" tab), and the translation of the chat together with the Certificate of Accuracy.

14. Annexed hereto as Exhibit 13 are excerpts from the deposition transcript of Polina Dolginov, taken on December 15, 2009.

15. Annexed hereto as Exhibit 14 is a copy of an MSN chat between Ana Bove and Inga Mikhlyn, which took place on June 29, 2007 (which is exactly one week after Ana and Polina had the conversation memorialized in the MSN chat annexed hereto as Exhibit 12), together with the translation and the Certificate of Accuracy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

New York, New York
September 17, 2010



DANIEL AKSELROD (DA-2569)