

VAL MANDEL, P.C.
80 Wall St., Suite 1115
New York, New York 10005
(212) 668-1700
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
:
VADIM MIKHLYN, INGA MIKHLYN, and :
ABC ALL CONSULTING, INC. :
:
Plaintiffs :
:
-against- : 08 CV. 03367 (ARR-RER)
:
:
ANA BOVE, POLINA DOLGINOV :
ANNA BOVE COMPANY, LLC, :
ANA BOVE COLLECTIONS, INC. :
and ANNA BOVE EMBROIDERY SUPPLIES, INC. :
:
Defendants. :
:
-----X

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. :
-----X

**DECLARATION OF DANIEL AKSELROD IN OPPOSITION TO
DEFENDANTS' MOTIONS TO REMOVE "ATTORNEYS EYES ONLY" FROM
QUICKBOOKS, TO DIVIDE THE CASE INTO TWO SEPARATE LITIGATIONS AND
FOR AN INDEPENDENT FINANCIAL AUDIT**

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

I am associated with Val Mandel, P.C., attorneys for Plaintiffs. I make this declaration in opposition to defendants' motions to remove "Attorney Eyes Only" from QuickBooks, to divide the case into two separate litigations, and for an independent financial audit.

1. Annexed hereto as Exhibit 1 are excerpts from the transcript of the pretrial conference held on June 18, 2009.

2. Annexed hereto as Exhibit 2 are excerpts from the transcript of the deposition of Ana Bove, taken on November 24, 2009.

3. Annexed hereto as Exhibit 3 is a copy of the Certificate of Rights Transfer.

4. Annexed hereto as Exhibit 4 is a copy of my letter to Boris Kogan, Esq., dated September 30, 2009.

5. Annexed hereto as Exhibit 5 is a copy of an e-mail from me to Boris Kogan, Esq., dated March 9, 2010. Defendants never responded.

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)