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April 11, 2011

Via ECF

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

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

Dear Judge Reyes:

As per the Court's instructions, we are writing to inform you that Ana Bove and Polina Dolginov finally received the documents filed by Boris Kogan and Associates LLC ("Kogan") (Doc. No. 201) after Levisohn Berger LLP forwarded the email from the Court with the on April 11, 2011.

Even though Kogan filed the documents on Friday, April 8, 2011, due to Kogan's sealing order request, the *pro se* defendants and Levisohn Berger LLP have not been able to view the documents in the Doc. No. 201 Kogan filing until today. To the extent that the *pro se* defendants did not receive the documents until April 11, 2011, they request that, for now, their reply be due by April 25, 2011. We note that Kogan had approximately five weeks to prepare its papers.

In addition, because of this delay, Ana Bove and Polina Dolginov and the corporate defendants have not yet been able to take a position as to the waiver of the attorney-client privilege. They indicated that they would like to review the documents filed by Kogan and state their position to the Court on April 18, 2011 as to the unsealing of the documents.

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Thank you for your consideration.

Respectfully submitted,
LEVISOHN BERGER LLP


Jonathan Berger, Esq.

Cc: Ana Bove, Polina Dolginov (by email)
Eric Wertheim, Daniel Akselrod, lawyers for Plaintiff (via ECF)
Boris Kogan and Associates, LLC (by ECF and facsimile)