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DAVID COWAN
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April 25, 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:

We are filing this request on behalf of the *pro se* defendants. Currently, there is a conference scheduled for April 29, 2011 regarding the redaction of documents filed by Boris Kogan and Associates ("Kogan") (Doc. No. 201) and Kogan's motion to seal the documents (See April 15, 2011 order).

The *pro se* defendants and the corporate defendants are nearly complete with their reply to the papers filed by Kogan (Doc. No. 201). When the *pro se* defendants requested the April 25, 2011 extension (See Doc. No. 203), the request was based on their being unable to view the papers under Doc. No. 201 due to the papers having been sealed by Kogan. The *pro se* defendants did not realize that the April 25 deadline would overlap the Passover holiday. The last two days of Passover, today and tomorrow, are adhered to by Alex Sakirski. Because of Passover and translation issues, the *pro se* defendants have been unable to finalize their reply due today. Hence, they are requesting an extension of three days to file the reply on Thursday, April 28, 2011. In addition, this delay will not interfere with the orderly process of this case.

Thank you for your consideration, and we await the Court's further instructions.

Respectfully submitted, LEVISOHN BERGER LLP /s/ Jonathan Berger, Esq.

Cc: Ana Bove, Polina Dolginov, *pro se* defendants Eric Wertheim, Daniel Akselrod, lawyers for Plaintiff (via ECF) Boris Kogan and Associates, LLC (via ECF)