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May 4, 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:

Pursuant to the conference on April 29, 2011, the Court ordered the Defendants to file a letter identifying those documents and the proposed redactions for those documents previously filed under seal pursuant to Doc. No. 210. Hence, Defendants propose as follows:

1. **Exhibit 7** – Redacting the email from [db@boriskogan.com](mailto:db@boriskogan.com) to [annaboveembroidery.com](mailto:annaboveembroidery.com) titled, "Re: Subpoenas" dated September 14, 2009;
2. **Exhibit 8** – Redacting part of the email from [support@annaboveembroidery.com](mailto:support@annaboveembroidery.com) to [bk@boriskogan.com](mailto:bk@boriskogan.com) dated June 22, 2009, more specifically, the title of said email and the sentence that begins with the phrase, "As I....";
3. **Exhibit 12** – The bank records, more specifically those records that contain confidential information (See Protective Order);
4. **Exhibit 15** – Redacting part of the email from [db@boriskogan.com](mailto:db@boriskogan.com) to [support@annaboveembroidery.com](mailto:support@annaboveembroidery.com) dated January 5, 2010, more specifically the two sentences that are in the paragraph that begins with the phrase, "Additionally, we...."; and
5. **Exhibit 16** – the document in its entirety, due to this communication constituting attorney-client communication that falls outside the scope set forth by the Court.

We await further instructions from the Court regarding the above-referenced proposed redactions.

Thank you for your consideration.

Respectfully submitted,  
LEVISOHN BERGER LLP

/s/

Jonathan Berger, Esq.

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