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June 15, 2011

VIA ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Vadim Mikhlyn, Inga Mikhlyn and ABC All Consulting, Inc. v. Ana Bove, Polina Dolginov, et al.**
Docket No.: 08 CIV. 3367

Dear Judge Reyes:

On behalf of all parties, we are writing to request an extension of the discovery period in this matter until August 1, 2011.

The parties are amicably trying to resolve discovery issues that have arisen as a result of recently produced documents. Your Honor is already aware of one such issue raised by defendants regarding QuickBooks records produced by plaintiffs.

Another issue has come to light as result of numerous emails between the Kogan firm and the defendants, which have been filed in recent months in connection with their dispute over responsibility for Rule 37 discovery sanctions. These documents reveal that defendants have withheld thousands of chats and emails, and never disclosed their existence to us or to the Court during discovery or in the briefing of the Rule 37 motion.

The parties have already conferred in an effort to resolve these issues, and plan to continue those efforts. We thought it best to postpone the completion of the party depositions in the hopes of resolving these issues without the Court's

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involvement. That is why we are jointly requesting the extension.

Respectfully submitted,



Eric Wertheim

DA/st

cc: Ms. Ana Bove (via e-mail)
Ms. Polina Dolginov (via e-mail)
Peter L. Berger, Esq. (via e-mail)