

Ana Bove, Polina Dolginov (pro se Defendants)

June 16, 2011

Sent To:

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

Re: Mikhlyn, et al. v. Bove, et al.; Case No. 1:08-cv-3367

Dear Judge Reyes:

We file this letter in response to Plaintiffs' recent submission, dated June 15, 2011 [Doc #219].

We'd like to express our concern about the allegedly unproduced thousands of documents, which Mr. Wertheim mentioned. Plaintiffs filed this "joint" letter without providing Defendants a copy for review. And although Defendants don't oppose the extension request, Defendants wish to clarify some other important issues, which are described incorrectly in Mr. Wertheim's letter.

Within the course of this litigation, while Mr. Kogan was still our attorney, we gave him the following 4 types of CDs:

1. Attorney-Client privileged communications
2. For Boris K. Eyes Only (Skype chats).
3. Confidential correspondence with clients
4. Attorney Eyes only (trade secret)

All of this information, which was turned over to our former lawyer, Mr. Kogan, was provided on six CDs listed below. (*In each line, there is a date for each of the appropriate CDs, indicating when it was created and turned over to Mr. Kogan).

- 1.CD10 - 10.11.2009 Attorney Client Privilege
- 2.CD18 - 01.25.2010 Attorney Client Privilege (first version)
- 3.CD18 - 03.01.2010 Attorney Client Privilege (second version)
- 4.CD21 - 02.26.2010 For Boris K. Attorney Eyes Only Skype chats.
- 5.CD19 - 01.25.2010 Attorney Eyes Only (trade secret)

6.CD20 - 01.25.2010 Attorney Eyes Only

We don't know what Mr. Kogan did with those CDs. CD10, CD18 and CD20 was returned to us by Mr. Kogan. CD19 and CD21 were never returned to us by Mr. Kogan. Therefore, we assumed copies of CD19 and CD20 Mr. Kogan has forwarded to them, to Plaintiffs.

Mr. Kogan also didn't send these CDs to Levinson Berger. We know this because the Berger firm doesn't have them.

If Mr. Wertheim believes that Mr. Kogan didn't provide them, then we are willing to go through our copies, and produce whatever is appropriate, as soon as possible.

Except of that, we also seek to receive from Plaintiffs the documents which Plaintiffs sent to IRS office, about their tax reports;

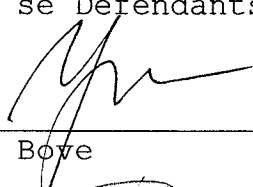
And also: Documents and Plaintiffs' correspondence with IRS regarding the 1099 and 1096 forms which Ana Bove sent for Mikhlyns' family to IRS;

And also: Documents concerning the QuickBook report provided by Plaintiffs;

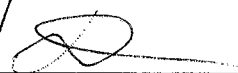
And also: Resolve the issue of bad physical state of some financial documents which Plaintiffs produced in Discovery;

Thank you for your consideration!

Respectfully submitted,
pro se Defendants Ana Bove, Polina Dolginov.



Ana Bove



Polina Dolginov

06.16.2011
Dated

CC to:

Mr. Eric Wertheim (ew@valmandelpc.net)
Mr. Daniel Akselrod (da@valmandelpc.net)