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ATTORNEY - CLIENT PRIVILEGE

02.21.10.

Marina, Boris, hello!

Unfortunately this letter didn't turn out to be short, but this is interesting, and as it seems to me, this is very important since it proves another of Mikhlyns' lies to the Judge.

I'd like return again to the most important, as it seems to me, issue - Court Requests No3:

3. Reyes wants to know what volume of chats/emails exist post April '08, and what would be involved in reviewing them to determine which are privileged.

First: Mikhlyns, while demanding from us chats/emails for the «post April'08» period, by themselves have provided us only 12-15 emails for 2008, and even those were the ones that they wanted, and that benefited them when filing to the case. (See the first Mikhlyns' CDs). If Mikhlyns think that this isn't so, and that they provided us enough business chats and emails for «post April'08» period, then they should specify where exactly this information is located.

Second: Mikhlyns demanded from us "all!!!" e-mail correspondence with our clients for 2008-2009, and by themselves didn't provide us any emails from their clients for the «post April'08» period. If Mikhlyns think otherwise, then they should specify where this information is located. They didn't give it.

Third: Eric demanded from us "all!!!" of our business correspondence between Anna Bove, Polina Dolginov, Alex Sakirski and other parties, while making excuses that Inga and Vadim didn't correspond with each other, since they're always located together, and therefore they don't have any business correspondence.

3a) This is another lie of Mikhlyns and Eric. From Vadim's testimony during his deposition we know that after April'08 their work places are located on different floors, and they're forced to write to each other, in order not to be running from one floor to another constantly.

3b) From the financial information received from Mikhlyns it follows that hired employees are constantly working for them - customer service, designers and others, who also sit near computers, and surely correspond with them via emails and chats. Mikhlyns should have been corresponding with them regarding various business issues, also. Finally, Olga Plyuschay (Inga's daughter), was always working from her home. She was daily and constantly corresponding with Mikhlyns regarding her specific work, and other issues. Without this Olga simply wouldn't be able to work.

** However, Mikhlyns didn't provide us any significant business correspondence for the after-April-08 period. If Mikhlyns think otherwise, then they should show where this information is.*

*** Like I've said earlier, Mikhlyns have grasped all business correspondence up to April 2008, stole our correspondence for 2002-2003 (See their flash at Yossi), didn't provide their correspondence for the after-April-2008 period, but at the same time are constantly complaining to the Judge that we don't give them something.*

Forth: Despite everything mentioned above -

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a) We have prepared and burnt 2,579 strictly-business emails for the "post-April-2008" period (80MB), which we are already ready to give them, in exchange for their correspondence.

b) Also, we've prepared 15,953 emails (1.25 GB), including trade secrets (addresses and emails of our clients, and also secrets of the sole designs production). Probably Boris will need to look through them, to make sure and to classify them?

c) I think, we shouldn't give neither (a) nor (b) to Mikhlyns. After all, they didn't give their emails for the "post-April-2008".

Fifth: We've counted the volume of information that you, Boris, will probably need to look through to determine it's privileges, since we're sure that this is Attorney-Client privileged information. This is:

a) 1,475 emails = 1GB of Russian e-mails with attachments in Russian. And also:

b) 65,700 documents = 12GB. These documents were received by Anna Bove, Polina Dolginov, Alex Sakirski, and also written by us regarding the case, including drafts, re-sendings to each other, translations and different versions. A huge lot of them are in Russian language. After all, for nearly two years we're amicably, all together writing and sending to each other documents regarding this case.

c) There's also our correspondence in Skype (chats). We've removed a lot from there since it's Attorney-Client privilege. But probably you'll need to check - whether we didn't remove an excess. All of this is also in Russian. Generally 99% of correspondence of Anna and Polina with me - it's Attorney-Client privilege. Overall, the majority of our communications are namely regarding this case, and not business. I nearly don't participate in business correspondence.

To summarize, I'd like to remind that we're talking here about a small on-line embroidery business. This business sells designs (for embroidery) via the Internet, in electronic form, which can be downloaded directly from the internet site and pay for the purchase there as well, or receive by mail on CD. Except of designs, the business sells thread for stitching these designs, and a little bit of other supplies. Neither the thread, not the other supplies are produced by the business - it's just re-selling them. This business may be easily run by 2-3.5 people working full time.

What is to hide here? What plots and secrets are covered in emails? What kind of truth regarding the case do Mikhlyns wish to find in these business documents? All the secrets are --- the database of our new clients, and our new products and methods of work. This is what Mikhlyns wish to receive, and also to drag the case, in order not to allow to uncover their long-term, constant and now proceeding larceny.

We're also ready to do and provide them ours, if this will be needed.

Alex.