

YAHOO! SMALL BUSINESS**Re: about russian papers - Update**

Thursday, February 25, 2010 7:10 AM

From: "mk@boriskogan.com" <mk@boriskogan.com>**To:** "AnnaBoveEmbroidery.com" <support@annaboveembroidery.com>

Hi Alex,

We will need to sit down and review the documents at some point. However, for right now, our priority is Eugene's deposition. I have spoken to Daniel Axelrod and he has made it very clear that we are to turn over any chats/emails in Eugene's possession prior to the deposition on Monday. I have not received any of these documents from you for review. I would need to receive them today in order to be able to review them prior to turning them over to the oppositon. You need to be aware that as a private citizen, Eugene is under no obligation to retain any documents. However, if his computer is audited at some point in the future, it would look very bad if it were shown that he had such documents and did not share them, or that he deleted such documents. Please get back to me and let me know (1) if Eugene would like to come to our office this week to be prepped, and (2) if any documents are available, please email them to me today.

I am pressing the issue because the scheduled deposition will not take place unless we turn over the documents this week and both sides would be very upset if the deposition were not to occur.

Finally, I'm not sure if you are aware of this, but one of the papers served by the opposition identifies Eugene as Ana's possible drug source. Eugene needs to be prepared for questions on Monday on this topic.

Thank you,

~Marina

-----Original Message-----

From: AnnaBoveEmbroidery.com [mailto:support@annaboveembroidery.com]**Sent:** Thursday, February 25, 2010 06:35 AM**To:** mk@boriskogan.com**Cc:** 'Boris Kogan'**Subject:** about russian papers - Update

02.24.10.

Marina, Boris, hello!

In last email (that specifies a large amount of documents, located on our computers), I forgot to say that 90% of the documents in Russian language have english translations, and were once sent to you, since they are materials of our case. Except of that, there are many versions of the same documents there (on different stages of their writing), before they were sent to you.

I think that if we (I and Anna) will sit together with you (Marina or Boris) to look through them, with the purpose of determining their privileges, this may take not so much time at all. In fact, the priveleges of many of them may be determined just by the name, e.g. even without opening.

Alex

=====

Attorney-Client Privilege.

This email, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: "mk@boriskogan.com" <mk@boriskogan.com>

To: AnnaBoveEmbroidery.com <support@annaboveembroidery.com>
Sent: Wed, February 24, 2010 6:42:13 PM
Subject: Re: Depositions schedule

Hi Alex,

Other than Eugene's deposition, no other depositions have been scheduled as yet. I will keep you informed as soon as I learn more.

~Marina

-----Original Message-----

From: AnnaBoveEmbroidery.com [mailto:support@annaboveembroidery.com]
Sent: Tuesday, February 23, 2010 04:14 PM
To: mk@boriskogan.com
Cc: 'Boris Kogan'
Subject: Depositions schedule

Marina, hello again!

Could you please email us if there is already some kind of schedule of the future depositions.

With respect,
Alex

=====
Attorney-Client Privilege.

This email, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.