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February 2, 2012

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., No. CV 08 3367

Dear Judge Reyes:

The parties have not yet concluded the Settlement Agreement in final form. The Agreement is quite long and was proposed in the English language. I reviewed it in that language and forwarded it to the clients with comments. The clients had to have a professional translator translate it into Russian, and that took some time. Thereafter, they reviewed it in the Russian language and met with a lawyer familiar with IP who is both fluent in Russian and English. They discussed the Agreement and were to circle back to discuss comments with me.

Their lawyer was on vacation last week, and he only returned yesterday. I will be leaving for vacation this Thursday and will return on February 10th, so that there is not sufficient time for defendants to review and arrive at a final document with plaintiff's counsel before February 15, 2012.

We would ask that you grant an additional one-month extension until Friday, March 16, 2012. The parties are not seeking to delay, but want to have this matter resolved so that future conflicts between the respective parties are substantially minimized. Plaintiff's counsel has consented to the contents of this letter.

Thank you for your cooperation.

Respectfully submitted,
LEVISOHN BERGER LLP


Peter L. Berger

cc: Dan Akselrod, Eric Wertheim, attorneys for Plaintiff