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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

VADIM MIKHLYN, INGA MIKHLYN,
AND ABC ALL CONSULTING, INC.,)

Plaintiffs,)

v.)

ANA BOVE, POLINA DOLGINOV,
ANNA BOVE COMPANY, LLC,
ANNA BOVE COLLECTIONS INC.,)
AND ANNA BOVE EMBROIDERY)
SUPPLIES, INC.,)

Defendants.)

ANA BOVE,
ANNA BOVE COMPANY, LLC,
AND ANNA BOVE EMBROIDERY)
SUPPLIES, INC.,)

Counter-Plaintiffs,)

v.)

VADIM MIKHLYN, INGA MIKHLYN,
AND ABC ALL CONSULTING, INC.,)

Counter-Defendants.)

Index No. CV 08 3367

J. SIFTON
M. J. REYES

ANA BOVE'S SECOND
SUPPLEMENTAL DECLARATION
IN SUPPORT OF
COUNTERCLAIMANTS' MOTION
FOR A PRELIMINARY INJUNCTION

1. Exhibit 1 attached hereto is the opening screen on the CD which was registered in the Copyright Office showing numerous icons. If one clicks on an icon the respective "page" is displayed with my embroidery designs.

2. Exhibit 2 is taken from the web page showing a “most popular designs” box in the upper right hand corner.
3. While prior papers have generally stated that Inga Mikhlyn became the bookkeeper in the United States in 2004 and began to control the money, this is somewhat inaccurate. In mid-2004, she was hired as a part time bookkeeper for the abc company, and Polina Dolginov and I continued to control the finances.
4. In late 2005, after the Mikhlyns formed Anna Bove Collections, Inc. (which was really a d/b/a of ABC All Consulting, Inc.) and told me that as a foreigner I could not register an American company. Based on the Mikhlyns false assurance that Anna Bove Collections, Inc. was a legitimate corporation owned by me, I then transferred the business financial accounts to Anna Bove Collections, Inc., which was under Inga Mikhlyn’s sole control.
5. As stated in my first supplemental declaration of September 24, 2008, Inga Mikhlyn received regular payments for her work from Anna Bove Collections, Inc., (via my and Polina’s personal PayPal account) – not from ABC All Consulting. This is specifically identified in paragraphs 3-11. The Mikhlyns do not contradict this which is yet another independent piece of evidence establishing that Inga Mikhlyn drew regular pay from the abc companies for her work, while neither Polina Dolginov or I did.
6. Vadim Mikhlyn did not work for the abc company until 2007 when he became the administrator of the Internet based websites replacing Polina Dolginov. The takeover of all of the abc business assets was accomplished by the Mikhlyns shortly after they gained control of the websites (although Polina and I did not discover this fact until April of 2008).
7. The business had grown significantly by 2007 reaching sales of just under one million dollars. The Mikhlyns claim that they contributed \$200,000, however that is an absolute falsehood. After the initial investments made

by Polina and me and by the time the Mikhlyns began working with us, the business was generating enough profits to cover all expenses – no further investment was needed. The Mikhlyns' claim to have invested \$200,000 is spurious. Neither Polina nor I were ever advised of such investment.

8. It takes approximately six months to obtain the special threads needed for the embroidery business I started. While I wait to obtain such threads, the Mikhlyns continue to use those of abc.
9. I suspect the Mikhlyns are also using the abc funds for this litigation, while I have been blocked from those same funds. That could not be more unfair.
10. It is imperative this court order an immediate freeze on all financial data of any business run by the Mikhlyns in the embroidery business in order that further wasting and misuse of funds not be permitted to continue. Even if we were partners, which we were not, they could not exclusively use and control partnership assets.

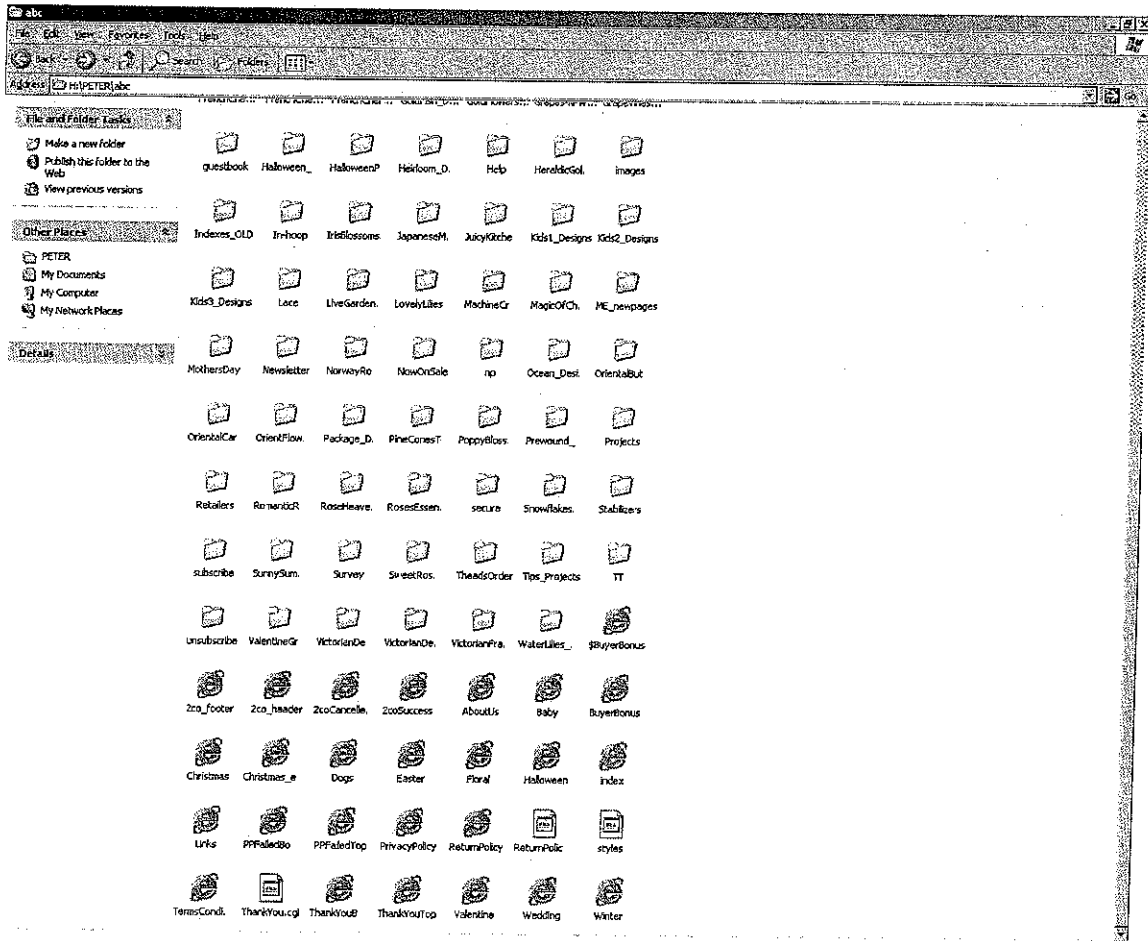
I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

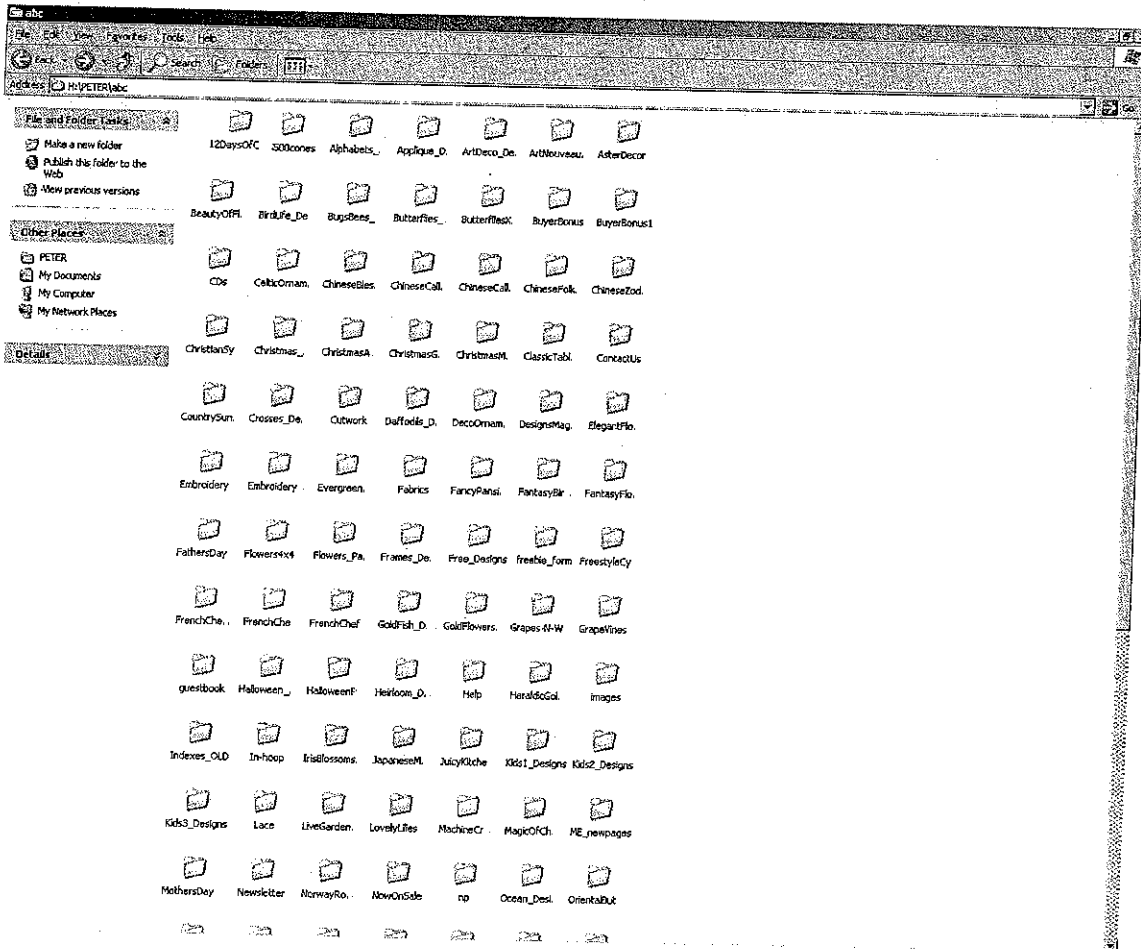


Ana Bove

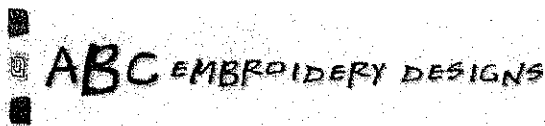
Date: 10.07.2008

**EXHIBIT 1 TO THE SECOND
SUPPLEMENTAL DECLARATION OF
ANA BOVE**





**EXHIBIT 2 TO THE SECOND
SUPPLEMENTAL DECLARATION OF
ANA BOVE**



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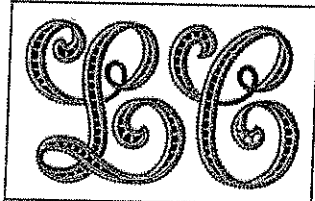
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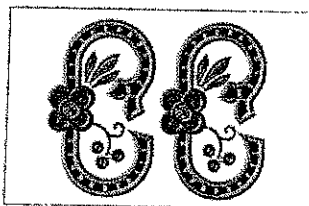
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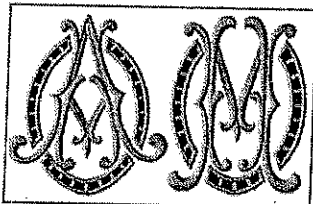
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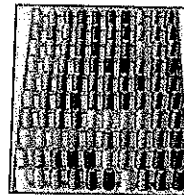
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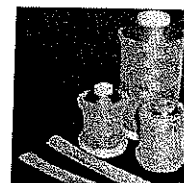


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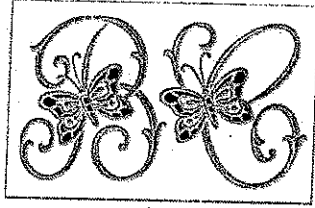


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