

FROM

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May 12, 2008

6801 19th Ave. #4P
Brooklyn, NY 11204

Via Express Mail and
E-mail: abc.all@fusemail.com, abcembro@fusemail.com

Re: **Ana Bove v. Inga Mikhlyn, Vadim Mikhlyn**
Our File No. 08/1105

Dear Mr. and Mrs. Mikhlyn:

Please be advised that we represent Ana Bove, the creator and owner of web domains: ABC-CROSS-STITCH-PATTERNS.COM, ABC-EMBROIDERY-DESIGNS.COM, ABC-FREE-CROSS-STITCH-PATTERNS.COM, ABC-FREE-MACHINE-EMBROIDERY-DESIGNS.COM, ANNABOVECOLLECTIONS.COM (the "Domains") and eBay store ABC-Embroidery-Designs, located at <http://stores.ebay.com/ABC-embroidery-designs>. Being the original creator, our client is also the owner of the proprietary copyright and trademark rights in the entire content of these domains, including, but not limited to, the domain names, website designs and code, embroidery designs, stitch patterns and marks, including the "ThreaDelight" mark.

Ana Bove is also the owner of the company, ABC ALL CONSULTING, INC., (aka ANNA BOVE COLLECTIONS, Inc.) (the "Company") and the sole proprietor to the valuable client database, associated with the domains and the company.

As you are well aware, the business was born out of Ana's life-long fascination with the arts of stitching and embroidering. The Domains were purchased / registered by Ana Bove as early as 2002 with intent of creating a web-based business, as well as making her name and work known among the stitching and embroidering enthusiasts worldwide. Letters ABC, prominent in the domain names were intended as abbreviation of Ana's name and mark "Anna Bove Collections."

Over the course of the next several years, Ana Bove expended tremendous work and creative energy to build the domains from the ground up into a successful and rapidly growing online business. The services offered under the domain names/marks included, among others, the sales of stitching/embroidery supplies, as well as unique stitching/embroidery designs, created by Ana Bove.

As business continued to grow, Ana's name, as well as the domains, their services, marks and designs became widely known and famous in stitching/embroidery industry worldwide, and particularly in the United States. Ana's marks became famous marks within the meaning of the federal Anti-Dilution Act, 15 USC 1125(e).

In 2004-2005, Ana resided outside the United States, and expansion of Ana's business was particularly rapid in the United States. For this reason, Ana started looking for US-based payment processing/accounting and warehouse services for her business. Your offer to provide such services was accepted by Ana because of your US residence, status as close relatives and Ana's trust in honesty and integrity of her relatives. As you know, in 2004 and 2005, Ana transferred a considerable amount of money onto your account for inventory procurement and as remuneration for your services.

As your US services initiated, Ana remained outside the US, continually working on improving the Domain design, structure and content, managing client relations, and all other facets of her growing business other than US financial and legal matters in which she relied on your representations.

Not being a US citizen, Ana lacked the mastery of the English language and knowledge of US law and business customs. In flagrant breach of decency and your fiduciary duties, you utilized these weaknesses to continually misrepresent the state of financial affairs with intent to induce Ana to take only the minimal amounts of income for personal use. All, while you used Ana's company profits for your own personal benefit and profit. In betrayal of trust and violation of fiduciary duties, in an attempt to convert Ana's business and property to yourself, you added your personal names to legal documents and filings that you promised to file in Ana's name. Your actions culminated in unlawfully usurping all control over the domains and the eBay store by changing the passwords and registrations of the domains. Such actions constitute conversion and fraud under the New York civil law. Such actions also constitute cyberpiracy and other violations under federal Lanham Act (15 USC 1125(d)).

Ana Bove never transferred to you any of the rights in intellectual property created by her, or created for her by others as work for hire. Ana Bove is the sole owner and proprietor of all stitching and embroidery designs, images, textual contents, advertising letters, texts, marks, slogans and other creative works that you continue to utilize in connection with eBay sales and converted domains. Aforesaid acts violate Ana Bove's exclusive rights under §106 of the Copyright Act of 1976, 17 U.S.C. §106, and constitute infringement of her copyrights. Your past and continuing copying, distribution and sale of our client's

copyrighted works constitutes a willful and deliberate infringement and is causing irreparable harm and damage to our client.

Your past and continuing use of Ana's name in commerce constitutes the violation of Ana's rights of privacy and publicity in violation of New York Civil Rights Law 50, 51 and New York common law.

Furthermore, your use of Ana's name and marks, including, but not limited to "abc-cross-stitch-patterns.com", "abc-cross-stitch-patterns", "abc-embroidery-designs.com", "abc-embroidery-designs", "ThreaDelight" "ABC ALL CONSULTING", "ANA BOVE COLLECTIONS", Visual impressions / trade dress of the website and products, and famous designs, constitute multiple cases of willful trademark infringement in violation of Section 32 of the Lanham Act, 15 USC 1114, unfair competition, false representation, false endorsement, false designation of origin and trademark infringement in violation of Section 43(a) of the Lanham Act, 15 USC 1125(a), trademark dilution in violation of Section 43(c) of the Lanham Act, 15 USC 1125(c), and trade dress infringement, among others. Please notice that federal Lanham Act provides, in cases of trademark infringement, for money damages, preliminary and permanent injunctive relief, and in appropriate cases of willfulness, recovery of treble (3X) damages and reasonable attorneys' fees.

Your actions in taking over and denying access to our client's domain, as well as the continuing deceit of customers and users of the Domains and the eBay store, as to the ownership, control and origin of services, further constitutes unfair competition and false advertising under New York and federal law, and unjust enrichment at the expense of our client, in violation of New York common law.

Our client has already been substantially and irreparably damaged, and continues to be damaged by your control over the domains and the eBay store, and the ongoing violation of our client's rights of publicity, intellectual property and other rights.

We request that you immediately cease and desist from using our client's eBay store, domains, trademarks and copyrighted materials. In order to mitigate further damage to our client, the following actions on your part are required:

1. Immediate cessation of use of our client's name, initials, eBay store, domains, all trademarks and all copyrighted materials.
2. Immediate transfer to our client of all logins, passwords, and other information necessary for our client's access and unimpeded use and assumption of control over the domains and the eBay store.
3. Accounting / Auditing to Ana Bove for all of the sales and/or income/monetary transfers received by you in connection with the domains, the eBay store, and by ABC ALL CONSULTING, INC., (aka ANNA BOVE COLLECTIONS, Inc.) and any other corporations created for or in connection with Ana Bove's name or business, since your first performance of services in 2004.
4. Payment to our client of the actual damages suffered by her as a result of your withholding of the funds. Damages for withholding and/or conversion of the funds

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are currently estimated to be at least \$1,000,000 (one million dollars), and continue to accrue.

A written affirmation and proof of compliance with the above requirements must be received by our law firm, in writing, no later than June 20, 2008. Unless we receive your reply, in writing, by this date, we will presume that you do not intend to voluntarily take the necessary actions outlined above. Please be advised that we have been instructed to take the necessary appropriate steps to enforce our client's rights.

Ana Bove expressly reserves all of her rights and remedies in regard to this matter and this letter shall not constitute or be construed to in any way constitute a waiver of any rights of Ana Bove.

We look forward to your prompt response.

Very truly yours,

A handwritten signature in cursive script that reads "Alexey Bakman". The signature is written in black ink and is positioned above the typed name.

Alexey Bakman, Esq.