

Subj: **Re: Mikhlyn v. Bove**  
Date: 3/13/2009  
To: [ew@valmandelpc.net](mailto:ew@valmandelpc.net)  
CC: [jberger@llbl.com](mailto:jberger@llbl.com), [db@boriskogan.com](mailto:db@boriskogan.com), [trotberg@llbl.com](mailto:trotberg@llbl.com), [pberger@LLBL.com](mailto:pberger@LLBL.com)

Eric,

1. I will send out a letter today to all parties who have been served with a subpoena asking them that at this time they are only to comply with the subpoena insofar as the documents relate to the business of ABC All consulting Inc., and that they may be required to furnish documents relating to Inga and Vadim Mikhlyn at a later time upon further instructions. A copy of the letter will be faxed to you shortly.
2. In the meanwhile you could obtain your clients' complete personal bank records so you can determine your position vis-a-vis the merits of objecting to their production.
3. Please furnish a list of all business accounts, as well as all personal accounts.
4. I will review with my clients and with Peter Berger the issues raised during our meeting regarding "post-divorce" business records. As I mentioned, none of your 113 document demands addressed that request.
5. Also, please advise as to the basis for seeking disclosure of communications between Anna Bove and Polina Dolginov which do not relate to the business.

Very truly yours,

Boris Kogan  
Boris Kogan & Associates  
277 Broadway, Suite 701  
New York, NY 10007  
Tel: (212)625-8910  
Fax: (212)219-2728  
Email: [bk@boriskogan.com](mailto:bk@boriskogan.com)  
Visit us on the web at [www.boriskogan.com](http://www.boriskogan.com)

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