

# BORIS KOGAN & ASSOCIATES

ATTORNEYS AND COUNSELORS AT LAW

---

277 BROADWAY, SUITE 701  
NEW YORK, NY 10007  
TEL: (212) 625-8910  
FAX: (212) 219-2728  
WWW.BORISKOGAN.COM  
EMAIL: BK@BORISKOGAN.COM

November 10, 2009

**Sent Via ECF To:**

Honorable Judge Ramon E. Reyes  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Mikhlyn, et al. v. Bove, et al.**  
**Case No. 1:08-cv-3367**

Honorable Judge Reyes:

The parties jointly agree to the following deposition schedule with the understanding that: (a) each side preserves its right under Rule 30 to seek additional days of deposition with respect to any witness if the witness' deposition is not completed in the scheduled time, (b) with respect to the depositions of Vadim and Inga Mikhlyn, plaintiffs will consent to a second day of either or both depositions if defendants request it; and (c) the parties will negotiate any issues about the length and scheduling of depositions in good faith before seeking Court intervention:

Monday, November 23, 2009 Ana Bove

Tuesday, November 24, 2009 Ana Bove

Wednesday, November 25, 2009 - Representative from Accounting and Tax Services

Tuesday, December 1, 2009 Inga Mikhlyn

Monday, December 7, 2009 Zinaida Bolyachevski

Wednesday, December 9, 2009 Vadim Mikhlyn

Thursday, December 10, 2009 Alex Sakirski

Wednesday, December 16, 2009 Polina Dolginov (the parties

stipulate that this deposition will last beyond the seven hour limit of Rule 30(d) and will continue for half a day on Thursday, December 17, 2009. In the event that more time is needed to complete the deposition thereafter, it shall be done remotely.)

Very truly yours,

/s/ Boris Kogan  
Boris Kogan (BK-9135)

BK:ya