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December 14, 2009

VIA ECF

Honorable Ramon E. Reyes
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Vadim Mikhlyn, Inga Mikhlyn and ABC All Consulting, Inc. v. Ana Bove, Polina Dolginov, et al.**
Docket No.: 08 CIV. 3367

Dear Judge Reyes:

We represent the plaintiffs in this action.


We are writing on behalf of all parties to request a brief extension of the discovery schedule. Since the last conference before Your Honor, the parties have been working cooperatively and intensively to complete depositions and resolve discovery issues.

Nonetheless, because of the great volume of evidence exchanged in discovery and the numerous legal and factual issues in the case, and because Russian language interpreters have to be used for virtually all depositions, it is taking longer than expected to complete the depositions. In addition, if discovery is extended, the parties will have more time to resolve outstanding discovery disputes and thereby minimize pre-trial motion practice about the same.

Accordingly, we jointly request an extension of discovery from December 22, 2009 to January 30, 2010.

We further request that the Court conference, scheduled for December 22, 2009, not be adjourned, as it may help resolve the above mentioned discovery disputes.

Respectfully submitted,


Eric Wertheim

EW/da