



John W. Moscow  
212 822 0164  
john.moscow@lbkmlaw.com

September 9, 2021

**VIA ECF**

**MEMO ENDORSED**

The Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**Re: In Re Application of Makhpal Karibzhanova for Judicial Assistance  
Pursuant to 28 U.S.C. § 1782 (Case 1:21-mc-00442-KPF)**

Your Honor:

We write on behalf of both applicant Makhpal Karibzhanova and movant Vladislav Kim in regard to the September 5, 2021 Motion to Intervene and Modify Bank Subpoenas and for Protective Order (“Motion”). ECF 33. Pursuant to the instructions of Chambers, Ms. Karibzhanova hereby submits her intention to oppose the Motion. Having met and conferred, counsels for Ms. Karibzhanova and Mr. Kim jointly request that the Court enter a scheduling order directing that Ms. Karibzhanova shall respond to the Motion by **September 27, 2021**.

Further, by this letter, Mr. Kim respectfully moves the Court for leave to file a reply brief within **ten (10) days** of Ms. Karibzhanova’s opposition. Ms. Karibzhanova does not object to his request.

Respectfully submitted,

/s/ John W. Moscow  
John W. Moscow  
*Counsel for Makhpal Karibzhanova*

/s/ L Andrew S. Riccio  
L Andrew S. Riccio  
*Counsel for Vladislav Kim*

Application GRANTED.

Applicant Karibzhanova is directed to file a motion in opposition on or before **September 27, 2021**. Movant Kim is directed to file a reply on or before **October 7, 2021**.

The Clerk of Court is directed to terminate the motion at docket entry 42.

Dated: September 10, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE