

national holidays from January 1, 2011 to January 11, 2011, some of the attendees for the deposition have not been able to secure the appropriate visas for entry into Russia.

3. The Parties believe that Mr. Kuznetsov has information relevant to this litigation, and are working to secure a deposition date from Mr. Kuznetsov that will allow for all of the attendees to secure the appropriate travel credentials.

4. Pursuant to the December 2, 2010 Amended Docket Control Order, the Parties do not believe that granting this Motion for Leave to Depose Alexey Kuznetsov will impact any deadline in this case.

5. These Defendants and Plaintiff respectfully request this Court to grant leave for the Parties to take the deposition of Mr. Kuznetsov after January 10, 2011.

Dated: January 10, 2010

Respectfully submitted,

/s/ J. Thad Heartfield

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CERTIFICATE OF SERVICE

The undersigned certifies that, on January 10, 2011, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ J. Thad Heartfield _____
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