UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

SALITA PROMOTIONS CORP.,

Case No. 2:20-cv-12547-LJM-EAS

Hon. Laurie J. Michelson

Plaintiff,

V.

SHOHJAHON ERGASHEV and OLEG BOGDANOV,

Defendants.

CLARK HILL PLC Charles E. Murphy (P28909) 151 S. Old Woodward Ave., Ste. 200 Birmingham, MI 48009 Tel: (248) 988-5879 cmurphy@clarkhill.com

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Attorneys for Plaintiff

PLAINTIFF'S REPORT REGARDING GOOD-FAITH ATTEMPTS TO MEET AND CONFER WITH DEFENDANTS

Plaintiff, Salita Promotions Corp. ("Salita Promotions"), by and through Clark Hill PLC, its undersigned attorneys, hereby states that, in accordance with

this Court's September 18, 2020 *Opinion and Order Granting in Part Ex Parte Motion for Temporary Restraining Order* [doc #8], has attempted on multiple occasions to meet and confer with Defendants Shohjahon Ergashev ("Ergashev") and Oleg Bogdanov ("Bogdanov") (collectively, "Defendants") in a good-faith attempt to resolve this matter without further court intervention, but that Defendants have ignored all of Salita Promotions' attempts to date.

Specifically, the undersigned counsel for Salita Promotions emailed Bogdanov at his last known email address, <u>ice99@inbox.ru</u>, on September 18, 21, 23, 24, and 25 with a copy of this Court's Order and request to meet and confer. Bogdanov has failed and/or refused to reply to the emails. In addition, Dmitriy Salita, president of Salita Promotions, sent Ergashev messages on September 18, 21, 24 and 25 asking for a meet and confer via WhatsApp. Those messages appear to have been read, but Ergashev has failed and/or refused to respond.

Respectfully submitted,

CLARK HILL PLC

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Dated: September 25, 2020