UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KINOJUZ I.P.

Plaintiffs

v.

IRP INTERNATIONAL INC.; OULIAN DOUBININE; IGOR ERLIKH

Defendants

CIVIL ACTION No. 11cv0299-DLI-VVP

SUPPLEMENT TO

REQUEST TO ENTER DEFAULT

AS TO DEFENDANT IRP INTERNATIONAL INC.

F.R.C.P. Rule 55(a)

TO: ROBERT C. HEINEMANN, CLERK UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

With reference to its Request to Enter Default, dated March 24, 2010 Plaintiff
KINOJUZ I.P., respectfully submits the letter of a former counsel for IRP
INTERNATIONAL INC., indicating his declination to enter appearance and to represent said defendant, and therefore plaintiff reiterates its request to enter its default.

IRP INTERNATIONAL INC. was served on February 2, 2011, the Proof of Service filed under Docket #7.

Respectfully submitted:

Dated: March 31, 2011

/s/

GEORGE LAMBERT (D.C. Bar No. 979327), pro hac vice LAW OFFICES OF LEONARD SUCHANEK 1025 Connecticut Avenue, #1000, NW Washington, D.C., 20036 Tel. (202) 640 1897, Fax (202) 747 7797 E-mail: lawdc10@aol.com Attorneys for Plaintiff Kinojuz I.P.

Law Offices of Bukh & Associates, PLLC Attorneys & Counselors at Law

1123 Avenue Z Brooklyn, NY 11235 Tel.:718-376-4766 Fax: 718-376-3033 www.bukhlaw.com

March 21, 2011

George Lambert, Esq. Law Offices of Leonard Suchanek 1025 Connecticut Avenue #1000, NW Washington, D.C., 20036

Re: Kinojouz, I.P. v. IRP International et. al. Index No.: CV11-0299

Dear Mr. Lambert,

Please be advised that this firm will, effective as of the date of this letter, no longer be representing any of the defendants in the instant action. From this time forward, the individual defendants will be pro se defendants. As to the corporate defendant, we are unaware of it having obtained substituted counsel as of this date.

Please direct all future correspondence or other communication directly to the particular defendant to whom it is concerning/addressed and also, please be further advised that we are no longer able to accept service on any defendant's behalf.

Very Truly Yours,

For the Firm

James M. Kruta, Esq.

CERTIFICATE OF SERVICE

I, George Lambert, counsel of record, pro hac vice, for plaintiff Kinojuz I.P., certify that on March 31, 2011, I served, by U.S. First Class Mail, postage prepaid, the foregoing, on the pro se defendants in this action, as follows:

Igor Erlikh

6910 Avenue U, Apt.# 2S

Brooklyn, NY 11234

and

Oulian Doubinine

1437 W. 4th Street, Apt.# 3

Brooklyn, NY 11204

Done on March 31, 2011. /s/

George Lambert