

FAMILY COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

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ROY DEN HOLLANDER, Petitioner, Docket No. O-03570/02

-against-

NOTICE TO ADMIT

ALINA SHIPILINA, Respondent, JUDGE: JODY ADAMS

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To: Nicholas J. Mundy

Pursuant to CPLR 3123 and within twenty days after service of this notice, the petitioner requests the respondent to admit, for the purpose of this proceeding only and subject to all pertinent objections to admissibility which may be interposed at the hearing, the truth of the following matters of fact:

1. During October 2001, annulment/divorce proceedings between petitioner and respondent were on going in the Supreme Court of the State of New York in the County of New York before Justice Joan Lobis, Index No. 350091/01.
2. On October 4, 2001, respondent and her attorney, Paulette Detiberiis, attended a compliance conference before Justice Joan Lobis in the annulment/divorce proceedings between petitioner and respondent, Index No. 350091/01.
3. At the compliance conference noted in number 2 above, Justice Lobis in the presence of respondent and Ms. Detiberiis granted petitioner the right to file a motion to set aside the Preliminary Conference Stipulation that stated fault would not be an issue in the annulment/divorce proceeding between petitioner and respondent.
4. Following the compliance conference noted in number 2 above, respondent understood that petitioner's filing of a motion to set aside the Preliminary Conference Stipulation that stated fault would not be an issue in the annulment/divorce proceeding between petitioner and respondent might result in a trail on the issue of fault.
4. A criminal decree was filed against respondent's mother, Inessa Shipilina, by a Krasnodar prosecutor on January 25, 2002, that charged Inessa Shipilina with defaming the petitioner.
5. Respondent has worked as a lap dancer at the topless club called Flash Dancers located at 1674 Broadway in Manhattan.

6. Respondent continues to work as a lap dancer at the topless club called Flash Dancers located at 1674 Broadway in Manhattan.

7. Respondent has worked as a lap dancer at the topless club called Flash Dancers located at 1674 Broadway in Manhattan since July 2000.

Dated: New York, New York

May 17, 2002

Roy Den Hollander

Petitioner

545 East 14th Street, Apt. 10D

New York, NY 10009

212 995 5201

To: Nicholas J. Mundy

Attorney for Respondent

Kuba, Mundy & Associates

321 Broadway

New York, NY 10007

212 732 5050

FAMILY COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

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ROY DEN HOLLANDER, Petitioner, Docket No. O-03570/02

-against-

PETITIONER'S FIRST

ALINA SHIPILINA, Respondent, **NOTICE FOR DISCOVERY**

AND INSPECTION

JUDGE: JODY ADAMS

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PLEASE TAKE NOTICE, that, pursuant to the provisions of Rule 3120 of the Civil Practice Law and Rules, petitioner, Roy Den Hollander, demands that respondent, Alina Shipilina, produce for inspection and copying the documents described below at 4:00 p.m. on Friday, June 21, 2001, at the Village Copier, 20 East 13th Street, New York, NY 10003.

PLEASE TAKE FURTHER NOTICE that this Notice is continuing and applies as well to any additional responsive documents that come within defendant's possession or control after the date of production.

INSTRUCTIONS AND DEFINITIONS

1. Unless otherwise specified, all requests cover the period **JANUARY 1, 1996** to the date of production.
2. Requests for documents "since" a certain date means from that date to the date of production.
3. Use of the word "and" means "and/or" and use of the word "or" means the same thing.
4. References to anything "owned" by respondent or "held" in her "name" or by her includes anything owned in whole or in part by respondent, or jointly by her with any others, or in which she has a beneficial interest, provided that respondent's interest is at least 10% of the total, and also any account on which respondent is a named signatory (without regard to the percentage of her legal or beneficial interest and no matter in what capacity she is a signatory).

5. References in the present tense to respondent's ownership of any assets include both past and present ownership during all or part of the period specified, as the case may be.

6. Use of the words "including" and "any" are not restrictive and mean "including without limitation" and "any/or all", respectively.

DOCUMENT DEMANDS

1. With respect to the income, earnings, salaries, wages, commissions, interest, dividends, bonuses, funds, returns of capital, reimbursed expenses, gifts, legacies, loans, advances and other monies or securities received by defendant from all sources, including prostitution; stripping; lap dancing; and erotic and pornography videos, digital recordings and still photographs: all documents reflecting such payments since January 1998.

2. With respect to all checking accounts held in respondent's name individually or jointly with another or others: the checkbooks, checkbook stubs, monthly statements, computer printouts, computer disks and other documents reflecting the status of and activity in such accounts since September 1, 2001.

3. With respect to all cash accounts, savings accounts, certificates of deposit, money market funds, trusts, custodial accounts and other cash deposits held in respondent's name individually or jointly with another or others: the monthly statements, transaction records, computer printouts and computer disks reflecting the status of and activity in such accounts since September 1, 2001.

4. With respect to all mutual funds and brokerage accounts held in respondent's name for transactions in securities of any kind (including stocks and bonds, issued by any entity, foreign or domestic, private or governmental): monthly statements, transaction records, computer printouts and computer disks reflecting the status of and activity in such accounts since September 1, 2001.

5. All Russian international and national passports and any other passports of defendant's in force at any time since 1996.

6. Originals or copies of any complaints respondent filed with the New York City Police Department since January 1, 2002.

7. Originals or copies of any criminal proceedings brought against respondent's mother, Inessa Shipilina, by prosecutors in Krasnodar, Russia.

8. All model photo cards used by respondent since July 1, 2000.

9. Originals or copies of all respondent's work schedules for Flash Dancers Topless Club located at 1674 Broadway in Manhattan.

10. Originals or copies of telephone billing records for the numbers 718 274 4902 and 917 374 4713 for October 2001, February 2002, and March 2002.

11. With respect to all credit cards in respondent's name or maintained for her benefit since September 1, 2001: the monthly bills, statements, and vouchers.

12. Electronic address book and any other list of defendant's customers or clients for whom she engaged or engages in prostitution as defined by New York State Penal Law Section 230, and for whom she engaged or engages in erotic performances including lap dancing and stripping in return for economic gain.

Dated: New York, New York
May 17, 2002

Roy Den Hollander
Petitioner
545 East 14th Street, Apt. 10D
New York, NY 10009
212 995 5201

To: Nicholas J. Mundy
Attorney for Respondent
Kuba, Mundy & Associates
321 Broadway
New York, NY 10007
212 732 5050

FAMILY COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

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ROY DEN HOLLANDER, Petitioner, Docket No. O-03570/02

-against-

INTERROGATORIES

ALINA SHIPILINA, Respondent, SECOND SET

JUDGE: JODY ADAMS

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To: Nicholas J. Mundy

The petitioner, Roy Den Hollander, requests that the respondent, Alina Shipilina, answer under oath, in accordance with Article 31 of the CPLR, the following interrogatories:

1. State the full name, age, residence and post office addresses, home telephone numbers, business addresses and business telephone numbers and occupation for the man who telephoned Petitioner on behalf of Respondent in October 2001 and left a voicemail at Petitioner's mobile telephone number stating the following:

“Roy Den Hollander, how are you? This is John Madison calling on behalf of Angelina. Your ex or soon to be ex wife (inaudible). Now that she is getting new counsel, and mainly we're going to challenge every answer to your filings, every aspect of this marriage, being that it originated in Russia. And basically try to understand that because of the fact that things didn't work out, your malicious actions are basically going to be very carefully reviewed, not only by the proper authorities, but also under every ledger of the lawyer. We will challenge every single aspect of your filings and of this case. And I assure you one thing; we're not going to basically keep our eyes closed to this issue. We are going to basically be looking at this very carefully, and we will challenge you on every aspect. I assure you of one thing on this arbitration hearing, I will be attending.

And as far as everything else goes, I can tell you first hand with all due respect that I'm disgusted by the way you handled it. And quite frankly, I question every single bit of your motions and your filings. And, I assure you one thing, that this issue is definitely going to be an issue that you're going to have to face up to reality on my friend. So as far as it goes, I will leave you with that. And I will try to reach you at home to see if you are there.

But in the meantime, bear in mind that this case is not going to go basically with her lying down and being abused over this whole issue. And you trying to take advantage of

the situation and try to claim all these (laughter) basic unfounded claims against her. Which basically have no foundation whatsoever. On the other hand, it really reflects on you on how you've handled this, and that a lot of your issues are very questionable. So, never the less, I will be trying to get in touch with you and have yourself a nice day."

2. State the full name, age, residence and post office addresses, home telephone numbers, business addresses and business telephone numbers and occupation for the man who telephoned Petitioner on behalf of Respondent in February 2002 and left a voicemail at Petitioner's mobile telephone number stating the following:

"Mr. Hollander, this is John Pierre, and I left you a message earlier on. And I did speak with you but apparently for whatever reason, you obviously weren't available to talk. I'm giving you a courtesy phone call.

I'm going to tell you to cease and desist with your actions against Angelina. I will tell you right now that what you're doing, I know everything about you. I know exactly what you have been doing and your past history and your record. I know everything about you sir.

I liked to explain to you what's going to happen. If you continue harassing and making this girl's life miserable, I will promise you that everything under the law and under my ability to do so under the law, I will pursue you in every way shape and form imaginable under the law, and make sure that justice is done because right now you disgust me. As a human being, I am just so disgusted with everything about you and what you've done to this girl. More than some pathetic form of display of inhuman treatment—you've gone beyond that sir. I'm very much available! And let me tell you something that I am extremely well known in this city, and I know everything about you. You better get your act together, and I am telling you this under fairness and courtesy—cease and desist with what you are doing to this girl and her family and the way you try to (affect) her in her country. Because you, my friend, are right now going to be under investigation if I hear one more word that this is happening. And it's not going to be by me, but the federal government. And you at this point in time have crossed several boundaries that cause for a lot of red flags to (wave) in the air my friend.

So, quite frankly, right now I would be basically on my good behavior. All I'm telling you do the right thing Mr. Hollander, it obviously is the best thing to do. Be human and be courteous and understanding of other people's feelings and their lives. I think you guys are over and done with. That's it—leave her alone! Have a nice day."

3. State the full name, age, residence and post office addresses, home telephone numbers, business addresses and business telephone numbers and occupation for the man who telephoned Petitioner on behalf of Respondent in March 2002 and stated the following:

Mr. Hollander, this is John Pierre calling on behalf of Angelina. I told you before to cease and desist with your legal actions. I'm warning you do not testify before the INS or we will meet. (In the background, I heard Alina say 'About my mother and the prosecutor.') And do not try to get the case in Russia reopened. We're watching you, have a nice day.

4. State the nature of the relationship between the Respondent and the men whose names were answered in Interrogatories 1, 2 and 3 above.

5. State when, where, how and under what circumstances Respondent met the men whose names were answered in Interrogatories 1,2 and 3 above.

6. State the full name, address and telephone numbers of anyone and everyone Respondent talked with regarding any of the telephone calls cited in Interrogatories 1,2 and 3 above.

7. State all names Respondent has used since 1996, where used and the purpose for using such names.

8. State whether Respondent has ever associated with any criminals in Russia, Cyprus, Italy, Mexico or America and when, where and with whom associated.

9. State reason or reasons Respondent went to the 114th Police Precinct in March 2002 as concerns Petitioner.

10. State with whom Respondent talked at the 114th Police Precinct in March 2002 and the content of those discussions concerning Petitioner.

11. State what notice Respondent has of any United States Immigration and Naturalization investigations or proceedings concerning Respondent, the nature of the investigations or proceedings and when notified about them.

PLEASE TAKE FURTHER NOTICE that a copy of such answers must be served upon the undersigned within twenty (20) days after the service of these interrogatories.

Dated: May 23, 2002

New York, New York

Roy Den Hollander

545 East 14th Street, Apt. 10D

New York, NY 10009

(212) 995 5201

FAMILY COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

-----X

ROY DEN HOLLANDER, Petitioner, Docket No. O-03570/02

-against-

INTERROGATORIES

ALINA SHIPILINA, Respondent, JUDGE: JODY ADAMS

-----X

To: Nicholas J. Mundy

The petitioner, Roy Den Hollander, requests that the respondent, Alina Shipilina, answer under oath, in accordance with Article 31 of the CPLR, the following interrogatories:

1. State your full name, age, residence and post office addresses, home telephone numbers, business addresses and business telephone numbers for the past four (4) years.

2. State the names, telephone numbers and addresses of all employers, agents, clients, customers or any other person or entity that provided you with money and the amount or other economic benefit and the monetary value of such, including but not limited to material goods and travel, in return for your providing services that included but were not limited to prostitution, lap dancing, stripping or any other form of sexual activity as defined by New York State Penal Law Section 130 or sexual conduct as defined by New York State Penal Law Section 230 and displaying any portion or all of your body for video, digital or still pictures or a live audience from July 11, 2000, until the

present. Give the date, place, payment, expenses and nature of services provided for each provision of services and reason for termination.

3. As to your present places of work, state:

a. Name and address of owner and manager;

b. Type of work performed, position held and nature of work or business in which you are engaged;

c. Amount of time you have been working at present jobs;

d. Hours of work at each;

e. Rate of pay or earnings, setting forth specifically your gross and net average weekly income, salary, wages, commissions, overtime pay, bonuses and gratuities and itemized expenses;

Attach copies of all evidence of above payments and expenses, including pay stubs, W2 forms, etc. for the past year.

4. State and itemize all deductions from your gross weekly earnings or other emoluments, including but not limited to taxes, insurance, savings, loans, pensions, profit sharing, dues and stock options.

5. State whether you have filed federal, state, local or other income tax returns during the last four (4) years with the appropriate tax authorities for any of the countries in which you earned income, including but not limited to the United States, Russia, Cyprus, Mexico and Italy. If so, indicate the years during which the same was filed and whether federal, state, local or other. If you have not filed a return or returns, state the reason or reasons why.

Attach copies of all such returns filed during the past four (4) years.

6. Itemize all bank, stock or brokerage accounts, certificates of deposit, treasury bills, stock certificates, notes or mortgages in your name or in which you have an interest presently or have had an interest during the past four (4) years, stating for each:

(a) The name and address of each bank, stock brokerage or other depository;

(b) The balance in those accounts as of the date of the service of the summons in this action;

(c) The present balance;

(d) The source of funds for all deposits and purchases made in said accounts;

(e) The name and address in which each account is registered, the account numbers and whether any individual, whether or not listed on said account, has an interest therein.

(f) If you hold any stock certificates, notes, mortgages or commercial paper not included above, itemize them and state the number of shares, their value, the location of the certificate, note, mortgage or other commercial paper and the source of the funds used to acquire them.

Attach copies of the monthly statements of such accounts for the past four (4) years and copies of savings account books or savings books and check registers.

5. State whether you have a safe deposit box or boxes either in your name individually, or in the name of a partnership, or corporation and to which you have access, stating the following:

(a) The location of each box and box number;

(b) The name in which it is registered and who, in addition to yourself, has access to each box;

(c) List the contents of each box since the boxes were rented by you. If the contents have changed over the time of your access to the boxes, then for each box state the approximate date and nature of what was put in and taken from each box.

7. If you have any cash in your possession or under your control in excess of \$500.00, specify;

(a) The amount of cash;

(b) Where it is located;

(c) The source of said cash.

8. State whether you have made any gift of any money and/or personal property to friends, relatives or anyone else during the past four (4) years of a value in excess of \$500.00. If so, state:

(a) The names and address of said person and the relationship of that person to you;

(b) The nature and value of the gift or the amount of money given;

(c) The date each gift was given;

(d) The reason for such gift;

(e) The source of the funds used to purchase such item.

9. What is respondent's current immigration status in the United States?

10. State the names of the employees of Flash Dancers Topless Club with whom respondent associates and any of their telephone numbers if known.

PLEASE TAKE FURTHER NOTICE that a copy of such answers must be served upon the undersigned within twenty (20) days after the service of these interrogatories.

Dated:

New York, New York

Roy Den Hollander

545 East 14th Street, Apt. 10D

New York, NY 10009

(212) 995 5201
