

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

DAVID GROCHOCINSKI, not individually)	
but solely in his capacity as the Chapter 7)	
Trustee for the bankruptcy estate of)	
CMGT, INC.,)	
)	
Plaintiff,)	No. 06 C 5486
)	
v.)	Judge Virginia M. Kendall
)	
MAYER BROWN ROWE & MAW LLP)	
and RONALD B. GIVEN,)	
)	
Defendants.)	

UNOPPOSED MOTION TO RESET DISCOVERY DEADLINE

Defendants Mayer Brown Rowe & Maw LLP and Ronald B. Given (together, the “Defendants”), by their attorneys, as and for their Unopposed Motion to Reset Discovery Deadline, state as follows:

1. The current deadline for discovery regarding the defenses that the Court and Parties have at various times referred to as the “absurd result,” “unclean hands” or “fraud on the court” defenses (the “Defenses”) is October 31, 2008.

2. Currently pending before the Court is Plaintiff’s Objection to Magistrate Judge Denlow’s Memorandum Opinion and Order dated June 9, 2008 (the “Objection”).

3. The Objection -- and the Court’s upcoming ruling thereon -- will decide certain issues relating to the scope of discovery regarding the Defenses. Because the scope of discovery regarding the Defenses has not yet been finally decided, the Parties have not yet taken any depositions regarding the Defenses in order to, among other things, avoid the possibility of having to repeat depositions after the scope of discovery is finally decided.

CERTIFICATE OF SERVICE

Steven J. Ciszewski, an attorney, hereby certifies that he caused a true and correct copy of the foregoing Unopposed Motion to Reset Discovery Deadline to be served through the ECF system upon the following:

Edward T. Joyce
Arthur W. Aufmann
Robert D. Carroll
Edward T. Joyce & Assoc., P.C.
11 S. LaSalle St., Suite 1600
Chicago, IL 60603

on this 22nd day of October, 2008.

/s/ Steven J. Ciszewski