

novack macey

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June 12, 2009

Robert D. Carroll
Edward T. Joyce & Associates, P.C.
Eleven South La Salle Street, Suite 1600
Chicago, IL 60603-1211

Re: CMGT, Inc. vs. Mayer Brown LLP, et al.

Dear Rob:

This is in response to your letter dated June 11, 2009.

I looked through your client's discovery requests and did not find one that asked for the documents that you now seek in your letter. In addition, discovery on the "unclean hands" defenses is now closed pursuant to Judge Kendall's order. Under these circumstances, we do not believe that we have any obligation to produce the documents that you have requested, and we are not willing to do so. In addition, some or all of the documents you seek are not discoverable and we reserve all rights, defenses and arguments with respect thereto and otherwise.

We will consider any additional points you wish to make about this subject, but I am going to be out of the office Monday, Tuesday and Wednesday of next week at an arbitration in Milwaukee. I will be happy to discuss this matter with you further when I get back to the office on Thursday.

Sincerely,



Mitchell L. Marinello

MLM:mlm

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