

3. Plaintiff's Response is his only opportunity to respond to Defendants' summary judgment motion. In order to fully address all of Defendants' arguments and assertions of purportedly undisputed facts, Plaintiff requires an oversize brief and Local Rule 56.1 statement.

4. Defendants do not object to the relief sought herein.

Wherefore, Plaintiff respectfully requests that this Court: (a) grant this Unopposed Motion; (b) grant Plaintiff leave to file a Response to Defendants' motion for summary judgment that is no longer than 30 pages in length; and, (c) grant Plaintiff leave to file a Local Rule 56.1(b)(3)(C) Statement containing no more than 75 numbered paragraphs.

Dated: June 19, 2009

Respectfully submitted,
DAVID GROCHOCINSKI, not individually, but
solely as the trustee in bankruptcy, for THE
ESTATE OF CMGT, INC.,

By: _____/s/ Edward T. Joyce_____
Plaintiff's attorneys

Edward T. Joyce
Arthur W. Aufmann
Robert D. Carroll
EDWARD T. JOYCE & ASSOC., P.C.
11 South LaSalle Street, Ste., 1600
Chicago, Illinois 60603
Telephone – (312) 641-2600
Atty No. 32513