

EXHIBIT B

**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,)	
RONALD B. GIVEN and CHARLES W.)	
TRAUTNER,)	
)	
Defendants.)	

**LAWYER DEFENDANTS' FIRST SET OF
DOCUMENT REQUESTS REGARDING UNCLEAR HANDS ISSUE**

Defendants, Mayer Brown Rowe & Maw LLP and Ronald B. Given (together, the "Defendants"), by and through their attorneys, Novack and Macey LLP, pursuant to Fed. R. Civ. P. 26 and 34, hereby request that Plaintiff produce the following documents.

DEFINITIONS AND INSTRUCTIONS

1. These document requests are propounded pursuant to Fed. R. Civ. P. 26 and 34 and the Order entered by the Court in the above-captioned matter on October 30, 2007, and shall be responded to in accordance with the directives set forth therein.

2. All responsive documents shall be produced for inspection and copying in accordance with Fed. R. Civ. P. 34 at the offices of Novack and Macey LLP, 100 North Riverside Plaza, Chicago, Illinois 60606.

3. "Complaint" means the Complaint filed in the above-captioned matter in the Circuit Court of Cook County, Illinois on August 23, 2006.

4. "Trustee" or "you" means David Grochocinski, and his affiliates or agents, including, without limitation, the law firms Grochocinski, Grochocinski & Lloyd, Ltd. and Edward T. Joyce & Associates, P.C. and any of their respective partners, attorneys, employees or agents.

5. "CMGT" means CMGT, Inc. including, without limitation, all of its officers, directors, shareholders, investors, management, employees, attorneys or agents.

6. "Spehar" means Gerry Spehar and/or Spehar Capital LLC including, without limitation, all of his or its officers, directors, shareholders, investors, management, employees, attorneys or agents.

7. "Defendants" means Ronald Given and the law firm Mayer, Brown, Rowe & Maw LLP and all of its partners, attorneys, employees or agents.

8. "Spehar Lawsuit" means the case captioned Spehar Capital, LLC v. CMGT, Inc., No. EC 037602, that Spehar filed against CMGT in the Los Angeles County Superior Court.

9. "\$17 Million Default Judgment" means that Judgment and Permanent Injunction Against CMGT, Inc. that was entered by the Clerk of the Los Angeles Superior Court on March 18, 2004 and that is alleged in Paragraph 63 of the Complaint and attached thereto as Exhibit 17.

10. "And" and "or" as used herein are both conjunctive and disjunctive, and the singular as used herein shall include the plural and the plural shall include the singular, except as the context may otherwise unambiguously require.

11. "Refer to" or "relate to" means, without limitation, describe, evidence, constitute, concern, regard, consist of, reflect, or be in any way logically or factually connected with the matter discussed.

12. The term “document” is used herein in the broadest sense and includes all written or graphic matter of every kind and description however produced or reproduced, whether draft or final, original or reproduction and all tangible things within the scope of the Fed. R. Civ. P., including, without limitation, all information in computer storage and all electronically stored data on magnetic or optical storage media as an “active” file or files (readily readable by one or more computer application or forensics software); any “deleted” but recoverable electronic files on said media; any electronic file fragments (files that have been deleted and partially overwritten with new data); and slack (data fragments stored randomly from Random Access Memory on a hard drive during the normal operation of a computer, sometimes called “RAM slack,” or residual data left on the hard drive after new data has overwritten some but not all of previously stored data), whether such files have been reduced to paper printouts or not. Such storage media includes, without limitation, hard drives or floppy disks and backup media (e.g., other hard drives, backup tapes, floppies, JAZ cartridges, CD-ROM’s). Such files include, without limitation, e-mails, both sent and received, whether internally or externally; all word-processed files, including drafts and revisions; all spreadsheets, including drafts and revisions; all databases; all CAD (computer aided design) files, including drafts and revisions; all presentation data or slide shows produced by presentation software (such as Microsoft PowerPoint); all graphs, charts and other data produced by project management software (such as Microsoft Project); all data generated by calendaring, task management and Personal Information Management (PIM) software (such as Microsoft Outlook or Lotus Notes); all data created with the use of Personal Data Assistants (PDA’s), such as Palm Pilot, Blackberry, HP Jornada, Cassiopeia or other Windows CE-based or Pocket PC devices; all data created with the use of document management software; all data created with the use of paper and electronic mail logging

and routing software; all Internet and Web-browser-generated history files, caches and “cookies” files generated at the work station of each employee and/or agent and on any and all backup storage media; and any and all other files generated by users through the use of computers and/or telecommunications, including but not limited to, voice mail. Any draft of a document or non-identical copy of a document is a separate “document.”

13. In answering these requests, please furnish such documents as are available to you, not merely documents that you now have in your own possession. This means that you are to furnish any and all documents that are in the possession of any of your agents and attorneys or otherwise subject to your care, custody, or control.

14. Pursuant to Fed. R. Civ. P. 26(b)(5), in the event that a document is not provided because of a claim of privilege or work-product protection, identify such document by providing the following information:

- a. its approximate date;
- b. a general description of its subject matter;
- c. the form in which the information is contained and/or was communicated (e.g., telephone conversation, memorandum, or letter);
- d. as applicable, the author, addressee, recipient, participant, or other person with knowledge of the information; and
- e. as applicable, the basis for the claim of privilege or work-product protection.

15. Each request herein shall be deemed to be continuing, and in the event that additional documents or information are later discovered by or become known to you, further response is to be made hereto without further request.

DOCUMENT REQUESTS

1. All documents relating to any investigation or analysis done by, or on behalf of, the Trustee before the Complaint was filed regarding the facts, circumstances, claims or damages alleged in the Complaint.
2. Any statement given by anyone regarding CMGT, Spehar or any of the facts, circumstances, claims or damages alleged in the Complaint, and all documents relating thereto.
3. All documents relating to any interview or communications with anyone regarding CMGT, Spehar or any of the facts, circumstances, claims or damages alleged in the Complaint.
4. All documents relating to any person who at any time was a shareholder, officer, director, employee, lender or investor of, to, or in CMGT.
5. All documents relating to Defendants' representation of CMGT.
6. Any communications between the Trustee and CMGT at any time before the Complaint was filed, and all documents relating thereto.
7. All documents relating to CMGT's assets, liabilities and/or purported creditors at or around the time the involuntary bankruptcy petition was filed against CMGT.
8. Any communications with, to or from -- or involving -- Spehar, and all documents relating thereto.
9. Any agreement with Spehar and all documents relating to any such agreement or any negotiations relating thereto.
10. All documents relating to the Spehar Lawsuit or the temporary restraining order or \$17 Million Default Judgment entered therein.

11. All documents relating to any investigation or analysis by the Trustee to determine if CMGT had any potential claims against Spehar or any other person including Charles Trautner.

MAYER BROWN ROWE & MAW LLP AND
RONALD GIVEN



One Of Their Attorneys

Stephen Novack
Mitchell L. Marinello
Steven J. Ciszewski
Novack and Macey LLP
100 N. Riverside Plaza
Chicago, IL 60606
(312) 419-6900

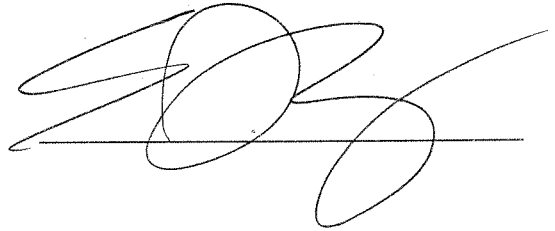
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CERTIFICATE OF SERVICE

Steven J. Ciszewski, an attorney, hereby certifies that he caused a true and correct copy of the foregoing Lawyer Defendants' First Set of Document Requests Regarding Unclean Hands Issue to be served by messenger delivery to:

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

on this 5th day of November, 2007.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.