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

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 Virgina M. Kendall
)
MAYER BROWN ROWE & MAW LLP,)
RONALD B. GIVEN, and CHARLES W.)
TRAUTNER,)
)
Defendants.)

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO DISMISS

Plaintiff, David Grochocinski, in his capacity as the Chapter 7 trustee for the bankruptcy estate of CMGT, Inc. ("CMGT"), moves for an extension of time to respond to defendants' Mayer Brown Rowe & Maw LLP's and Ronald B. Given's (collectively, the "Lawyer Defendants") motion to dismiss. In support of this motion, CMGT states as follows:

- 1. The Lawyer Defendants filed their motion to dismiss on November 30, 2006.
- 2. On December 4, 2006, the Court entered an order requiring CMGT to respond to the Lawyer Defendants' motion to dismiss on or before Tuesday December 19, 2006. The Lawyer Defendants' reply is due on or before December 29, 2006.
- 3. Between December 4, 2006 and December 11, 2006, CMGT's attorneys were engaged in an arbitration hearing before JAMS.
- As a result of this arbitration hearing, and not for the purpose of vexatious delay, 4. CMGT requires additional time to respond to the Lawyer Defendants' motion to dismiss.

- 5. Although CMGT anticipates needing only approximately an additional seven days to respond, because of the upcoming Christmas and New Year holidays, CMGT respectfully requests an extension of time to and including January 5, 2007 to file its response to the Lawyer Defendants' motion to dismiss.
- 6. The Lawyer Defendants have no objection to this motion. If this motion is granted, however, the Lawyer Defendants respectfully request an extension to and including January 24, 2007 to file their reply.

Wherefore, CMGT respectfully requests that an order be entered granting CMGT an extension of time to and including January 5, 2007 to file its response to the Lawyer Defendants' motion to dismiss and granting the Lawyer Defendants until January 24, 2007 to file their reply.

Dated: December 15, 2006 Respectfully submitted,

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

By:	/s/ Robert D. Carroll	
-	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