

**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 Virginia 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.
4. As a result of this arbitration hearing, and not for the purpose of vexatious delay, CMGT requires additional time to respond to the Lawyer Defendants’ motion to dismiss.

