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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,)
)
v.)
)
MAYER BROWN ROWE & MAW LLP and)
RONALD B. GIVEN,)
)
Defendants.)

No. 06 C 5486
Judge Virginia M. Kendall

RESPONDENT DAVID GROCHOCINSKI'S MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' MOTION FOR SANCTIONS

Respondent David Grochocinski, by his attorney, David E. Morgans, moves this court, pursuant to LR 78.3, for an extension of time, to March 14, 2011, within which to file his response to defendants' motion for sanctions. In support of this motion, respondent states the following:

1. Following the entry of summary judgment in favor of defendants and against plaintiff in the above-captioned matter, defendants brought a motion for sanctions against respondent Grochocinski and his attorney, Edward T. Joyce.
2. Grochocinski brought a motion to dismiss the motion for sanctions for lack of subject matter jurisdiction, and, while that motion was pending, the court stayed the briefing schedule of the motion for sanctions by order dated May 20, 2010.
3. On February 14, 2011, the court denied Grochocinski's motion to dismiss the motion for sanctions and, at the same time, set a briefing schedule on the motion for

sanctions, setting Grochocinski's response to the motion due on February 28, 2011, and defendants' reply due on March 7, 2011.

4. Respondent Grochocinski respectfully requests an additional 14 days, to March 14, 2011, to file his response to the motion for sanctions.

5. The record in this cause is voluminous, and counsel for Mr. Grochocinski believes that it will take more than 14 days to assemble a proper response to the motion. While counsel intends to devote the majority of his working time to the endeavor, the size of the task, the responsibility entailed and counsel's obligations to others suggest that 28 days to prepare the response will be needed.

6. David E. Morgans, counsel for respondent Grochocinski, has spoken and corresponded with Stephen Novack, counsel for defendants, who has advised him that defendants have no objection to a 14-day extension of time to respond to the motion for sanctions, conditioned on defendants' receiving a total of 14 days (from the present seven days) to file their reply-a condition to which moving counsel, in turn, does not object.

WHEREFORE, respondent David Grochocinski respectfully moves this court to extend the briefing schedule of defendants' motion for sanctions, setting Mr. Grochocinski's response as being due on March 14, 2011, with defendants' reply due on March 28, 2011.

Respectfully submitted,

MYERS CARDEN & SAX LLC

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