



5. Joyce has just completed a nearly final draft of its response to Defendants' motion for sanctions. Joyce's draft response is currently 35 pages in length.

6. Joyce's response brief is 35 pages because it (a) sets forth the factual and legal basis for Plaintiff's claims, (b) summarizes and defends Joyce's conduct at various stages of the litigation, and (c) responds to each of Defendants' sanctions arguments.

7. This Court has stated that it will rule on Defendants' Motion for Sanctions by mail, so Joyce's response brief will likely be its only opportunity to be heard on this matter. (*See* Docket Entry dated 2/17/11.)

8. Defendants do not object to this Motion, but reserve the right to request additional pages for their reply, if necessary.

9. Joyce has used reasonable diligence to keep its response brief as short as possible, but because of the nature of the motion and the number of issues and arguments that need to be addressed, Joyce has been unable to keep its response within the current 20-page limit. Accordingly, Joyce respectfully requests leave to file a 35 page response to Defendants' motion for sanctions.

Respectfully submitted,

EDWARD T. JOYCE & ASSOCIATES, P.C.

By:           /s/ Edward T. Joyce          

Edward T. Joyce  
Arthur W. Aufmann  
Robert D. Carroll  
The Law Offices of Edward T. Joyce & Associates, P.C.  
135 South LaSalle Street, Ste., 2200  
Chicago, Illinois 60603

**CERTIFICATE OF SERVICE**

The undersigned attorney, certifies that on March 9, 2011, he caused this document to be served upon

Stephen Novack  
Mitchell L. Marinello  
Steven J. Ciszewski  
**NOVACK AND MACEY LLP**  
100 N. Riverside Plaza  
Chicago, IL 60606

and

David Morgans  
Myers & Miller, LLC  
30 N. LaSalle St., Ste., 2200  
Chicago, IL 60602

by electronically delivering a copy through the Court's CM/ECF filing system.

/s/ Edward T. Joyce