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	S
)	
v.) Judge Virginia M. Kendali	l
MAYER BROWN ROWE & MAW LLP)	
and RONALD B. GIVEN,)	
min 10111 111 21 01 1 2119	,	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Defendants Mayer Brown LLP and Ronald B. Given (together, the "Defendants"), by their attorneys, Novack and Macey LLP, hereby move for an extension of time to file their reply brief in support of their pending motion for sanctions. In support of this unopposed motion, Defendants state as follows:

- 1. By order dated February 14, 2011, the Court ordered Plaintiff to file his response to Defendants' pending motion for sanctions by February 28, 2011.
- 2. On February 16, 2011, Plaintiff filed a motion for an extension of time -- until March 14, 2011 -- to file his response to the motion for sanctions. That motion was unopposed.
- 3. By order dated February 17, 2011, the Court granted Plaintiff's motion for extension of time to file his response brief.
- 4. On March 14, 2011, two response briefs were filed. Plaintiff, in his personal capacity, filed a response that was seventeen (17) pages long. In addition, counsel for Plaintiff in his capacity as Chapter 7 Trustee filed a response that was thirty-five (35) pages long. In all,

fifty-two (52) pages of response briefs were filed. The two response briefs raise many separate

and distinct issues and arguments.

5. Due to the collective length of the response briefs and the number of issues and

arguments addressed therein, as well as various scheduling conflicts with other matters,

Defendants will not be able to complete their reply briefs by the currently scheduled due date of

March 28, 2011.

6. Accordingly, Defendants respectfully request an extension of twenty-one (21)

days -- until April 18, 2011 -- to file their reply briefs.

7. Defendants contacted all counsels for Plaintiff and were advised they have no

objection to the relief sought by this motion.

WHEREFORE, Defendants respectfully request that the Court grant Defendants until

April 18, 2011 to file their reply briefs in support of their pending motion for sanctions, and such

other and further relief as is appropriate.

Respectfully submitted by,

MAYER BROWN LLP and RONALD B. GIVEN

By: /s/ Stephen Novack
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
Doc. #421756

CERTIFICATE OF SERVICE

Stephen Novack, an attorney, hereby certifies that he caused a true and correct copy of the foregoing Defendants' Unopposed Motion for Extension of Time to File Reply Brief to be served through the ECF system upon the following:

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

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

on this 18th day of March, 2011.

/s/ Stephen Novack	