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 |) No. 06 C 5486 |
| MAYER BROWN ROWE & MAW LLP and RONALD B. GIVEN, |) Judge Virginia M. Kendall) |
| Defendants. |) |

JOINT MOTION FOR LIMITED STAY OF PROCEEDINGS ON DEFENDANTS' MOTION FOR SANCTIONS

David Grochocinski, individually, and Defendants Mayer Brown LLP (formerly known as Mayer Brown Rowe & Maw LLP) and Ronald B. Given (collectively, "Defendants"), by their attorneys, move this court for a partial stay of the decision on Defendants' Motion for Sanctions and, in support thereof, state the following:

- 1. On April 29, 2010, Defendants filed a Motion for Sanctions seeking sanctions against Grochocinski, individually and as trustee of the bankruptcy estate of CMGT, Inc., and against the estate's counsel, Edward T. Joyce and Associates ("Joyce").
- The Motion for Sanctions was fully briefed, with Defendants' reply brief filed on April 18, 2011.
- 3. Grochocinski, individually and as trustee, and Defendants entered into settlement negotiations under the auspices of the United States Court of Appeals for the Seventh Circuit and have reached an agreement that is subject to certain conditions precedent.

4. It presently is unknown whether the conditions precedent to said agreement will

be satisfied, and additional time is needed to determine whether they will be.

5. Therefore, Grochocinski, individually, and Defendants request that the court not

rule on the pending Motion for Sanctions as against Grochocinski, in any capacity, but rather set

the matter for a status hearing two months hence.

6. Said agreement is not applicable to the Motion for Sanctions as against Joyce, and

this motion does not request that the Court delay ruling on the motion for sanctions as against

Joyce.

WHEREFORE, Grochocinski, individually, and Defendants respectfully move this court

to enter a stay of proceedings with respect to Defendant's Motion for Sanctions as against

Grochocinski in any capacity.

Respectfully submitted,

DAVID GROCHOCINSKI, individually

By: /s/ David E. Morgans

One of His Attorneys

MAYER BROWN LLP and RONALD B. GIVEN

By: /s/ Steven J. Ciszewski

One of Their Attorneys

David E. Morgans

MYERS CARDEN & SAX LLC

Thirty North LaSalle Street Suite 2200

Chicago, Illinois 60602

312/345-7250

Stephen Novack

Steven J. Ciszewski

NOVACK AND MACEY LLP

100 N. Riverside Plaza

Chicago, IL 60606

312/419-6900

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CERTIFICATE OF SERVICE

Steven J. Ciszewski, an attorney, hereby certifies that he caused a true and correct copy of the foregoing Joint Motion For Limited Stay Of Proceedings On Defendants' Motion For Sanctions 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 South LaSalle Street Chicago, IL 60603

David Edward Morgans Myers & Miller, LLC Thirty North LaSalle Street Suite 2200 Chicago, Il 60602

and by Federal Express overnight service, upon the following:

Gerard Spehar 1625 Grandview Avenue Glendale, CA 91201

on this 30th day of June, 2011.

| By: | /s/ | Steven J. Ciszewski | |
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