

1. Defendants first requested the information at issue in this motion on February 13, 2006. Since that time, Defendants have served additional request subject to an Order of this Court. Nevertheless, Plaintiffs have repeatedly refused to provide complete and substantive responses.

2. On December 15, 2006 the Court requested that the parties brief this issue and the Court set a briefing schedule.

3. Comprehensively addressing the inadequacy of Plaintiffs' responses, the bad faith refusal of Plaintiffs to participate in discovery, the factual history of these interrogatories and the litany of objections that Plaintiffs have asserted in opposition to Defendants motion requires more than the ten pages. While Defendants have attempted to fairly and completely address the factual and legal issues raised by Plaintiffs' refusal to adequately respond to Defendants' interrogatories with as much brevity as possible, any further reduction would impact the quality and clarity of the presentation made to the Court.

WHEREFORE, for the reasons stated above, Defendants respectfully request that they be granted leave to file a Memorandum of Law of fifteen pages.

Dated: January 3, 2007
Chicago, Illinois

Respectfully submitted,

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