

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
SENTINEL MANAGEMENT GROUP, INC., ) Case No. 07 B 14987  
)  
Debtor. ) Hon. John H. Squires

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on Thursday, September 11, 2008 at 9:30 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Honorable John H. Squires in Courtroom 680 at 219 South Dearborn Street, Chicago, Illinois, or before any other judge who may be sitting in his place and stead, and present the attached **Motion to Approve Stipulation and Agreed Order Extending Briefing Schedule**, at which time and place you may appear if you so desire.

Chicago, Illinois  
September 9, 2008

Respectfully submitted,

**FREDERICK J. GREDE**, not individually,  
but solely as Chapter 11 Trustee for the estate  
of **SENTINEL MANAGEMENT GROUP,  
INC.**

By:           /s/ Vincent E. Lazar            
One of his attorneys

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Counsel for the Chapter 11 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
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In re: ) Chapter 11  
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SENTINEL MANAGEMENT GROUP, INC., ) Case No. 07 B 14987  
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**MOTION TO APPROVE STIPULATION AND AGREED ORDER  
EXTENDING BRIEFING SCHEDULE**

Frederick J. Grede, the chapter 11 trustee (the "Trustee") for the estate of Sentinel Management Group, Inc. (the "Debtor" or "Sentinel"), by and through his undersigned counsel, hereby moves this Court (this "Motion") for entry of the Stipulation and Agreed Order Extending Briefing Schedule (the "Stipulation") by and between the Trustee and Cantor Fitzgerald & Co. ("Cantor"), a copy of which is attached hereto as Exhibit A. In support of this Motion, the Trustee states as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(E).
2. On August 17, 2007 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.
3. On August 23, 2007, the Bankruptcy Court entered an order granting the Debtor's motion for the appointment of a Chapter 11 trustee and, on August 29, 2007, the Trustee was appointed as the chapter 11 trustee of the Debtor by the United States Trustee. He has accepted his appointment, and is acting, duly qualified, as Trustee of the Debtor.
4. On September 6, 2007, the United States Trustee selected a committee of unsecured creditors for the Debtor's case.

5. On August 1, 2008, Cantor filed a Motion for Entry of an Order (1) Determining that Cantor Fitzgerald & Co. is Entitled to Recover Existing and Future Expenses from Escrowed Funds, and (2) Authorizing Distribution of Funds in Payment Thereof (the "Motion").

6. On August 14, 2008, this Court set a briefing schedule on the Motion. The Trustee was given until September 11, 2008 to file his response, and Cantor was given until September 29, 2008 to reply. A status hearing on the Motion is set for October 2, 2008.

7. The Trustee and Cantor have agreed to extend the briefing schedule in order to evaluate relevant documents, in furtherance of discussions that could lead to a consensual resolution of the Motion.

8. By this Motion, the Trustee requests that this Court enter the Stipulation attached hereto concerning the extension of the briefing schedule related to the Motion.

WHEREFORE, the Trustee respectfully requests that this Court enter the Stipulation, and grant such other and further relief as this Court deems just.

Dated: Chicago, Illinois  
September 9, 2008

Respectfully submitted,

**FREDERICK J. GREDE, not individually  
but solely as chapter 11 trustee for the estate  
of SENTINEL MANAGEMENT GROUP,  
INC.**

By:                   /s/ Vincent E. Lazar                    
One of His Attorneys

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*Counsel for the Chapter 11 Trustee*

**IN THE UNITED STATES BANKRUPTCY COURT  
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In re: ) Chapter 11  
)  
SENTINEL MANAGEMENT GROUP, INC., ) Case No. 07 B 14987  
)  
Debtor. ) Hon. John H. Squires

**STIPULATION AND AGREED ORDER EXTENDING BRIEFING SCHEDULE**

This Stipulation and Agreed Order (the “Stipulation”) is entered into by and between (i) Cantor Fitzgerald & Co. (“Cantor”), and (ii) Frederick J. Grede, not individually but as Chapter 11 trustee (“Trustee”) of Sentinel Management Group, Inc. (the “Debtor” or “Sentinel” and, together with Cantor and the Trustee, the “Parties”).

**RECITALS**

WHEREAS, on August 17, 2007 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division (the “Bankruptcy Court”);

WHEREAS, on August 23, 2007, the Bankruptcy Court entered an order granting the Debtor’s motion for the appointment of a Chapter 11 trustee and, on August 29, 2007, the Trustee’s appointment was approved by the Bankruptcy Court;

WHEREAS, on August 1, 2008, Cantor filed a Motion for Entry of an Order (1) Determining that Cantor Fitzgerald & Co. is Entitled to Recover Existing and Future Expenses from Escrowed Funds, and (2) Authorizing Distribution of Funds in Payment Thereof (the “Motion”);

WHEREAS, on August 14, 2008, this Court set a briefing schedule on the Motion. The Trustee was given until September 11, 2008 to file his response, and Cantor was given until September 29, 2008 to reply. A status hearing on the Motion is set for October 2, 2008;

WHEREAS, the Parties, by their respective counsel, have agreed to extend the briefing schedule in order to evaluate relevant documents, in furtherance of discussions that could lead to a consensual resolution of the Motion;

NOW, THEREFORE, in consideration of the mutual covenants and agreements set forth in this Stipulation, and with the intent to be legally bound, the Parties hereby agree, and the Court ORDERS, as follows:

**AGREEMENT**

1. The deadline for the Trustee to file and serve a response shall be extended to October 10, 2008.
2. The deadline for Cantor to file and serve a reply shall be extended to October 29, 2008.
3. The hearing for the Motion originally scheduled for October 2, 2008 shall be vacated, and the hearing shall take place on November 3, 2008 at 9:30 a.m.
4. This Stipulation may be executed by facsimile copy in one or more counterparts, all of which shall be considered one and the same agreement, and shall become effective when one or more counterparts have been signed and delivered by each of the parties.
5. The Bankruptcy Court shall retain exclusive jurisdiction over the Parties for the purposes of resolving all issues arising from or relating to this Stipulation or the implementation of this Stipulation.

**SO STIPULATED AND AGREED:**

Dated: September 9, 2008

Dated: September 9, 2008

**Cantor Fitzgerald & Co.**

**Frederick J. Grede, chapter 11 trustee for  
Sentinel Management Group, Inc.**

By: /s/ David S. Curry

By: /s/ Vincent E. Lazar

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*Counsel to Cantor Fitzgerald & Co.*

*Counsel to the Chapter 11 Trustee*

SO ORDERED this \_\_\_ day of \_\_\_\_\_, 2008

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UNITED STATES BANKRUPTCY JUDGE