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6 Attorneys for Defendants
 7 ZOLMAN CONSTRUCTION & DEVELOPMENT, INC. AND
 SYNERGY PROJECT MANAGEMENT, J/V; ZOLMAN
 8 CONSTRUCTION & DEVELOPMENT, INC., and
 SYNERGY PROJECT MANAGEMENT
 9

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 BOARD OF TRUSTEES OF THE) Case No.: C 07 02549 WDB
13 LABORERS HEALTH AND WELFARE)
TRUST FUND FOR NORTHERN) STIPULATION TO CONTINUE CASE
14 CALIFORNIA; BOARD OF TRUSTEES OF	MANAGEMENT CONFERENCE
THE LABORERS VACATION-HOLIDAY)
15 TRUST FUND FOR NORTHERN)
CALIFORNIA; BOARD OF TRUSTEES OF)
16 THE LABORERS PENSION TRUST FUND)
FOR NORTHERN CALIFORNIA; and)
17 BOARD OF TRUSTEES OF THE)
18 LABORERS TRAINING AND)
RETRAINING TRUST FUND FOR)
19 NORTHERN CALIFORNIA,)

20 Plaintiffs,

21 vs.

22 E. UGARTE, INC., a California corporation
 23 dba KEVIN NELSON CONCRETE
 CONSTRUCTION COMPANY; EDGARD
 24 ORLANDO UGARTE, an Individual;
 ZOLMAN CONSTRUCTION &
 25 DEVELOPMENT, INC. AND SYNERGY
 PROJECT MANAGEMENT, J.V., a joint
 26 venture; ZOLMAN CONSTRUCTION &
 DEVELOPMENT, INC., a California
 27 corporation; SYNERGY PROJECT
 28 MANAGEMENT, a sole proprietorship; and

DOES 1-10,

Defendants.

ZOLMAN CONSTRUCTION &
DEVELOPMENT, INC. AND SYNERGY
PROJECT MANAGEMENT, J.V., a joint
venture; ZOLMAN CONSTRUCTION &
DEVELOPMENT, INC., a California
corporation; SYNERGY PROJECT
MANAGEMENT, a sole proprietorship,

Cross-Claimants

vs.

E. UGARTE, INC., a California corporation,
dba KEVIN NELSON CONCRETE
CONSTRUCTION COMPANY, and ROES 1
through 25,

Cross-Defendants.

Defendants Zolman Construction & Development, Inc. and Synergy Project
Management, J/V, Zolman Construction & Development, Inc., and Synergy Project Management
wish to enter into a settlement of this matter and have taken affirmative steps to explore a
settlement with plaintiff directly, rather than through counsel. Telephone messages were
exchanged over the past month, and only this week did Mr. Reza Zolfaghari reach his contact at
the Laborers Fund. Defendants believe that an agreement can be reached in the near future but
require more time for that purpose and therefore request this continuance. Based on these
representations, plaintiffs' counsel, Kevin Ho, has agreed to a continuance of two weeks.
However, the Court not being available earlier, the parties agree that the case management
conference previously scheduled for July 9, 2009 at 1:30 p.m. may be continued to July 27, 2009

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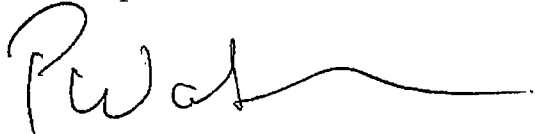
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1 at 1:30 p.m. Case Management Statements would therefore be due on July 20, 2009.

2 It is so stipulated.


3 Dated: July 1, 2009

4 LEONIDOU & ROSIN
Professional Corporation

5
6 By 
7 Patricia Walsh
8 Attorney for Defendants and Cross-Complainants
9 ZOLMAN CONSTRUCTION &
10 DEVELOPMENT, INC. AND SYNERGY
11 PROJECT MANAGEMENT, J/V; ZOLMAN
CONSTRUCTION & DEVELOPMENT, INC.; and
SYNERGY PROJECT MANAGEMENT

12 Dated: July 1, 2009

13 BULLIVANT HOUSER BIALEY PC

14
15 By 
16 Kevin K. Ho
17 Attorney for Plaintiffs
18 BOARD OF TRUSTEES OF THE LABORERS
19 HEALTH AND WELFARE TRUST FUND FOR
20 NORTHERN CALIFORNIA; BOARD OF
21 TRUSTEES OF THE LABORERS VACATION-
22 HOLIDAY TRUST FUND FOR NORTHERN
23 CALIFORNIA; BOARD OF TRUSTEES OF THE
24 LABORERS PENSION TRUST FUND FOR
25 NORTHERN CALIFORNIA; and BOARD OF
26 TRUSTEES OF THE LABORERS TRAINING
27 AND RETRAINING TRUST FUND FOR
28 NORTHERN CALIFORNIA

25 Pursuant to stipulation, IT IS SO ORDERED.

26 Dated: 7/2/09

