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16 Attorneys for Plaintiffs

17  
 18 **UNITED STATES DISTRICT COURT**  
 19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 20 **AT SAN FRANCISCO**

21 KATHLEEN PAULSEN, et al.

Plaintiffs,

v.

24 TEAMSTERS LOCAL 856;  
 INTERNATIONAL BROTHERHOOD OF  
 TEAMSTERS; AND JOE MARTINELLI,

Defendants.

Case No. C08-3109 EDL

**STIPULATION AND PROPOSED ORDER  
 TO CONTINUE CASE MANAGEMENT  
 CONFERENCE**

Hearing Date: September 30, 2008  
 Hearing Time: 3:00 p.m.  
 Courtroom: E, 15<sup>th</sup> Floor  
 Judge: Elizabeth D. Laporte  
 Complaint Filed: June 26, 2008

1 Plaintiffs and Defendants Teamsters Local 856, International Brotherhood of Teamsters, and  
2 Joseph Martinelli hereby stipulate to continue the Initial Case Management Conference in this matter,  
3 currently calendared for September 30, 2008, to October 31, 2008, immediately following the hearing  
4 in this matter on Defendants' Motions to Dismiss, or on a later date after determination on the  
5 Motions. Good cause exists to grant this continuance on the following grounds: (1) Defendants have  
6 filed Motions to Dismiss the Complaint which are set for hearing approximately one month after the  
7 presently scheduled Initial Case Management Conference; (2) the outcome of the Motions to Dismiss  
8 would likely impact the scope and substance of the pre-trial scheduling order in this case; and (3)  
9 judicial economy, including the costs of litigation, would be furthered by either hearing the Motions  
10 concurrently with the Initial Case Management Conference, or setting the Initial Case Management  
11 Conference after the determination on the pending Motions. The parties are not making this request  
12 for any improper purpose, including delay.

13  
14 Dated: September 23, 2008

BEESON, TAYER & BODINE, APC

15 By:           /s/Andrew H. Baker          

16 ANDREW H. BAKER

17 Attorneys for Teamsters Local 856 & Joe  
Martinelli

18 Dated: September 23, 2008

INTNL. BROTHERHOOD OF TEAMSTERS

19 By:           /s/Richard W. Gibson          

20 RICHARD W. GIBSON

21 Attorneys for IBT

22 Dated: September 23, 2008

KAHN BROWN & POORE LLP

23 By:           /s/David M. Poore          

24 DAVID M. POORE

25 Attorneys for Plaintiffs

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Initial Case Management Conference  
2 is hereby continued from September 30, 2008, to October 31 \_\_\_\_\_, 2008, at 10:00 a.m. in  
3 Courtroom E, 15<sup>th</sup> Floor, 450 Golden Gate, San Francisco, California.

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5  
6 Dated: September 23, 2008



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