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Counsel for Plaintiff, Alejandro Fox

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

19 ALEJANDRO FOX,
 20 Plaintiff,
 21 v.
 22 BAKERY, CONFECTIONERY, TOBACCO
 23 WORKERS and GRAIN MILLERS
 24 INTERNATIONAL UNION, LOCAL NO.
 25 24, AFL-CIO; BAKERY,
 26 CONFECTIONERY, TOBACCO
 27 WORKERS and GRAIN MILLERS
 28 INTERNATIONAL UNION, AFL-CIO;
 FELISA CASTILLO, an individual; and
 RANDY ROARK, an individual,
 Defendants.

CASE NO. CV-08-05737 WHA

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE THE CASE
 MANAGEMENT CONFERENCE**

Judge: Hon. William Alsup

1 **STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE CASE**
2 **MANAGEMENT CONFERENCE**

3 WHEREAS, a Case Management Conference is scheduled in this case for April 2, 2009
4 at 11:00 a.m.; and

5 WHEREAS, Jeffrey Freund, the General Counsel for the Defendant Bakery,
6 Confectionery, Tobacco Workers and Grain Millers (“BCTGM”) International Union, and the
7 attorney who will be trial counsel for BCTGM and Defendant Randy Roark, will be on a long-
8 scheduled vacation from March 11, 2009 to April 3, 2009 in Mozambique and South Africa to
9 visit his son, daughter-in-law, and granddaughter; and

10 WHEREAS, Defendants believe that the Case Management Conference, currently set
11 for April 2, 2009, will be more productive and efficient if Mr. Freund is present; and

12 WHEREAS, the BCTGM International Union and Randy Roark request that the Case
13 Management Conference originally set for April 2, 2009, be continued by one week to April 9,
14 2009, and counsel for the other parties do not object; and

15 WHEREAS, Plaintiff ALEX FOX agrees to move the Case Management Conference
16 one (1) week only to accommodate Mr. Freund’s conflict; if the Court is not available on April
17 9, 2009 for the Case Management Conference, then Plaintiff objects to the moving of the Case
18 Management Conference; and

19 WHEREAS, the parties agree to submit, not less than seven days prior to April 9, 2009,
20 a joint case management conference statement;

21 THEREFORE, the parties hereby stipulate, and request that the Court order, that
22 the Case Management Conference be continued to April 9, 2009, at 11:00 a.m.

23 DATED: March 12, 2009

BREDHOFF & KAISER, PLLC
ALTSHULER BERZON LLP

By: /s/ Peter E. Leckman
Peter E. Leckman

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DATED: March 12, 2009

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DATED: March 12, 2009

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[PROPOSED] ORDER

Pursuant to Stipulation, the Case Management Conference currently set for April 2, 2009, is hereby continued to April 9, 2009, at 11:00 a.m.

Dated: March 12, 2009.

