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8 Attorney for Plaintiffs

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

<p>11 BRICKLAYERS AND ALLIED CRAFTWORKERS 12 LOCAL UNION NO. 3, AFL-CIO, et al. 13 Plaintiffs, 14 vs. 15 VASSALLO TILE, MARBLE & GRANITE CORP., 16 a California corporation, et al. 17 Defendants.</p>	<p>) CASE NO.: CV 09-0371 VRW)) STIPULATION FOR) EXTENSION OF TIME TO) COMPLETE SETTLEMENT) CONFERENCE;) PROPOSED ORDER THEREON))))))</p>
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18 IT IS HEREBY STIPULATED by and between plaintiffs and
 19 defendants VASSALLO TILE, MARBLE & GRANITE CORP., GIOVANNI
 20 VASSALLO, ANTONIO VASSALLO and AMERICAN CONTRACTORS INDEMNITY
 21 COMPANY, in the above-described action, through their attorneys'
 22 of record, that:

23 WHEREAS, on July 15, 2009 this Court ordered that the above-
 24 captioned matter be referred to a settlement conference to take
 25 place between November 9 and November 25, 2009; and

26 WHEREAS, the settlement conference in this matter is
 27 currently scheduled for November 16, 2009 with Magistrate Judge
 28 Edward M. Chen;

WHEREAS, plaintiffs have propounded discovery requests on
 defendants, including Special Interrogatories, Set One and

1 Request For Production of Documents, Set One and have noticed the
2 depositions of defendant ANTONIO VASSALLO and the person most
3 knowledgeable from defendant VASSALLO TILE, MARBLE & GRANOITE
4 CORP. scheduled for late November 2009;

5 WHEREAS, on October 28, 2009 plaintiffs alerted this Court
6 to a discovery dispute between plaintiffs and defendant VASSALLO
7 MARBLE, TILE & GRANITE CORP. ("VASSALLO") concerning VASSALLO's
8 lack of response to plaintiffs discovery requests and meet and
9 confer efforts and have requested leave to file a Motion to
10 Compel;

11 WHEREAS, the discovery sought by plaintiffs, including the
12 depositions scheduled for late November 2009, will facilitate
13 more productive settlement discussions between the parties;

14 WHEREAS, on October 28, 2009 Judge Chen's secretary, Leni
15 Doyle, advised plaintiffs' counsel that Judge Chen has
16 availability to continue the settlement conference until December
17 22, 2009;

18 WHEREAS, the next Case Management Conference in this matter
19 is currently scheduled for December 17, 2009; now

20 THEREFORE, the parties request the Court (i) to extend the
21 deadline within which to conduct the settlement conference in
22 this matter until December 31, 2009, and (ii) to continue the
23 Case Management Conference in this matter currently scheduled for
24 December 17, 2009 to January 28, 2010 or on a date thereafter
25 convenient to the Court.

1 Dated: KATZENBACH & KHTIKIAN

2
3 /S/ Kimberly A. Hancock
4 Kimberly A. Hancock
5 Attorneys for Plaintiffs

6 Dated: DIEMER, WHITMAN & CARDOSI, LLP

7
8 Judith L. Whitman
9 Attorneys for Defendants
10 Vassallo Tile, Marble & Granite
11 Corp., Antontio Vassallo and
12 Giovanni Vassallo

13 Dated: LANAK & HANNA, P.C.

14 Robert Stroj
15 Attorneys for Defendant
16 American Contractors Indemnity
17 Company

18 **ORDER**

19 PURSUANT TO THIS STIPULATION, IT IS SO ORDERED that (i) the
20 deadline within which to conduct the settlement conference in
21 this matter is extended until December 31, 2009, and (ii) the
22 Case Management Conference currently scheduled for December 17,
23 2009 is continued until _____.

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26 Dated: _____
27 THE HONORABLE VAUGHN R. WALKER
28 UNITED STATES DISTRICT CHIEF JUDGE

1 Dated:

KATZENBACH & KHTIKIAN

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/S/ Kimberly A. Hancock

Kimberly A. Hancock
Attorneys for Plaintiffs

4

5

Dated:

DIEMER, WHITMAN & CARDOSI, LLP

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8

Judith L. Whitman
Attorneys for Defendants
Vassallo Tile, Marble & Granite
Corp., Antontio Vassallo and
Giovanni Vassallo

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Dated: 10/29/09

LANAK & HANNA, P.C.

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13

Robert Stroj *Charles T. Meyer for*
Attorneys for Defendant
American Contractors Indemnity *Robert Stroj*
Company

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ORDER

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PURSUANT TO THIS STIPULATION, IT IS SO ORDERED that (i) the
deadline within which to conduct the settlement conference in
this matter is extended until December 31, 2009, and (ii) the
Case Management Conference currently scheduled for December 17,
2009 is continued until _____

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Dated: _____

THE HONORABLE VAUGHN R. WALKER
UNITED STATES DISTRICT CHIEF JUDGE

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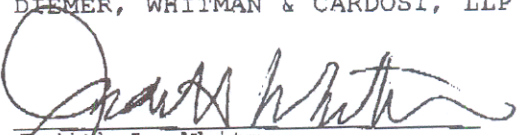
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Dated: 10/29/09

KATZENBACH & KHTIKIAN

/s/ Kimberly A. Hancock
Kimberly A. Hancock
Attorneys for Plaintiffs

Dated: 10/29/09

DIEMER, WHITMAN & CARDOSI, LLP

Judith L. Whitman
Attorneys for Defendants
Vassallo Tile, Marble & Granite
Corp., Antonio Vassallo and
Giovanni Vassallo

Dated:

LANAK & HANNA, P.C.

Robert Stroj
Attorneys for Defendant
American Contractors Indemnity
Company

ORDER

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED that (i) the
deadline within which to conduct the settlement conference in
this matter is extended until December 31, 2009, and (ii) the
Case Management Conference currently scheduled for December 17,
2009 is continued until February 4, 2010 at 3:30 PM.

Dated: 11/6/2009

