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6 Attorneys for Plaintiffs

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 BOARD OF TRUSTEES OF THE
 LABORERS HEALTH AND WELFARE
 11 TRUST FUND FOR NORTHERN
 CALIFORNIA; BOARD OF TRUSTEES OF
 12 THE LABORERS VACATION-HOLIDAY
 TRUST FUND FOR NORTHERN
 13 CALIFORNIA; BOARD OF TRUSTEES OF
 THE LABORERS PENSION TRUST FUND
 14 FOR NORTHERN CALIFORNIA; and
 BOARD OF TRUSTEES OF THE
 15 LABORERS TRAINING AND RETRAINING
 TRUST FUND FOR NORTHERN
 16 CALIFORNIA,

17 Plaintiffs,

18 v.

19 IS VENTURES, INC.,

20 Defendant.

Case No.: CV 09 4418 VRW

**STIPULATION TO PERMIT AUDIT
 AND STAY ACTION FOR 90 DAYS;
 ORDER THEREON**

Hearing Date: May 13, 2010
 Time: 10:00 a.m.
 Courtroom: 6, 17th Floor
Hon. Vaughn R. Walker

STIPULATION

22 IT IS HEREBY STIPULATED by and between Plaintiffs, on the one hand, and
 23 Defendant IS Ventures, Inc., on the other hand, that pursuant to the Motion for Mandatory
 24 Injunction set for May 13, 2010, Defendant IS Ventures, Inc., hereby agrees that this Court shall
 25 order IS Ventures, Inc., within 60 days of execution of the Order by this Court, to submit to an
 26 audit of its books and records and to produce and permit the auditors from Plaintiffs Trust Funds
 27

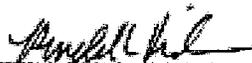
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2 to inspect the following for the audit period January 1, 2006 through May 2010:

3 California Quarterly Report of Wages, Form DE-6; Federal Tax
4 Forms W-3/W-2 and 1069/1099; Payroll Registers/Journals;
5 Individual Earnings Records; Source Records, including time
6 cards and time card summaries for all employees; contribution
7 reports for all trust funds; workers' compensation reports;
8 certified payroll reports; personnel records indicating job
9 classifications and hire/termination dates; cash disbursement
10 journal; vendor invoices; copies of subcontract agreements; cash
11 receipts journal; general ledger; job cost records; records of
12 related entities; and any other books and records that may be
13 necessary to complete the auditor's determination or provide
14 additional explanation.

15 IT IS FURTHER STIPULATED that this action be stayed for 90 days to allow the audit
16 and further, to allow the parties additional time to review and discuss the results of audit in an
17 attempt to resolve any dispute regarding the audit findings.

18 DATED: February 26, 2010

19 BULLIVANT HOUSER BAILEY PC

20 By 
21 Ronald L. Richman
22 Susan J. Olson

23 Attorneys for Plaintiffs

24 DATED: February 26, 2010

25 IS VENTURES, INC.

26 By 
27 Qumarruddin Sheikh

28 Officer of IS Ventures, Inc.

1 ORDER

2 Pursuant to the parties' Stipulation and good cause appearing:

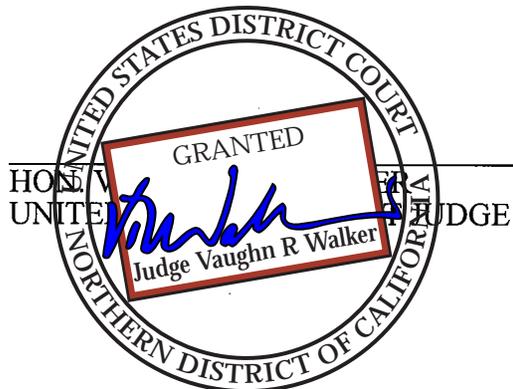
3 IT IS HEREBY ORDERED that Defendant IS Ventures, Inc. shall, within 60 days of
4 execution of this Order, submit to an audit of its books and records and to produce and permit
5 the auditors from Plaintiffs Trust Funds to inspect the following for the audit period January 1,
6 2006 through May 2010:

7 California Quarterly Report of Wages, Form DE-6; Federal Tax
8 Forms W-3/W-2 and 1069/1099; Payroll Registers/Journals;
9 Individual Earnings Records; Source Records, including time
10 cards and time card summaries for all employees; contribution
11 reports for all trust funds; workers' compensation reports;
12 certified payroll reports; personnel records indicating job
13 classifications and hire/termination dates; cash disbursement
14 journal; vendor invoices; copies of subcontract agreements; cash
15 receipts journal; general ledger; job cost records; records of
16 related entities; and any other books and records that may be
17 necessary to complete the auditor's determination or provide
18 additional explanation.

13 IT IS FURTHER ORDERED that this case is stayed for 90 days. A Case Management
14 Conference shall be scheduled for August 12, 2010 at 3:30 p.m., Courtroom 6, 17th
15 Floor. The parties are required to submit a Joint Case Management Conference Statement
16 seven (7) days prior to the new Case Management Conference advising this Court as to the
17 status of the audit and the parties' informal attempts to resolve any dispute regarding the results
18 of audit.

19 DATED: April 28, 2010

20 By



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