

1 Kent Khtikian, Esq. (#99843)
 Katzenbach and Khtikian
 2 1714 Stockton Street, Suite 300
 San Francisco, California 94133-2930
 3 Telephone: (415) 834-1778
 Facsimile: (415) 834-1842
 4 Attorneys for Plaintiffs

5
 6
 7
 8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11	BRICKLAYERS AND ALLIED CRAFTWORKERS)	Case No. CV 10-0112 EMC
12	LOCAL UNION NO. 3, AFL-CIO;)	
13	TRUSTEES OF THE NORTHERN CALIFORNIA)	
14	TILE INDUSTRY PENSION TRUST; TRUSTEES)	
15	OF THE NORTHERN CALIFORNIA TILE)	
16	INDUSTRY HEALTH AND WELFARE TRUST FUND;)	STIPULATION TO CONTINUE
17	TRUSTEES OF THE NORTHERN CALIFORNIA)	CASE MANAGEMENT
18	TILE INDUSTRY APPRENTICESHIP)	CONFERENCE
19	AND TRAINING TRUST FUND; TILE INDUSTRY)	
20	PROMOTION FUND OF NORTHERN CALIFORNIA,)	
21	INC., a not-for-profit California corporation;)	
22	TILE EMPLOYERS CONTRACT ADMINISTRATION)	
23	FUND; TRUSTEES OF THE INTERNATIONAL)	
24	UNION OF BRICKLAYERS AND ALLIED)	
25	CRAFTWORKERS PENSION FUND,)	
26	Plaintiffs,)	
27	vs.)	
28	ERIC LAWRENCE YOUNG, as an individual and doing)	
29	business as "Diablo Designs Tile And Marble";)	CMC Current Set For:
30	AMERICAN CONTRACTORS INDEMNITY)	Date: April 21, 2010
31	COMPANY, a California corporation,)	Time: 1:30 p.m.
32	Defendants.)	Courtroom: C (15 th Fl)
33)	San Francisco

34
 35 Plaintiffs and Defendant, American Contractors Indemnity Company ("ACIC"), by and
 36 through their counsel of record stipulate as follows:

- 37 1. On April 14, 2010 plaintiffs filed a request for entry of the default of Young.
- 38 2. Plaintiffs have agreed to provide ACIC withing the next 2 working days with copies of

1 documents from Young which Plaintiffs believe constitute an admission by Young that the
2 principal amount owed by Young to Plaintiffs exceeds \$41,000. The maximum amount payable
3 on the bond underwritten by ACIC in claims such as that in the instant controversy is \$4,000.

4 3. Plaintiffs and ACIC have quickly settled similar claims in the past.

5 4. ACIC is inclined to settle this matter upon reviewing the documents from Plaintiffs.

6 5. Plaintiffs and ACIC believe that there is a very high probability that Plaintiffs claims
7 against ACIC will be settled within 30 days.

8 6. Plaintiffs intend to file a motion for default judgment against Young following entry of
9 default by the Clerk. Plaintiffs expect to file such a motion within 90 days.

10 On the basis of the foregoing, Plaintiffs and ACIC request that the Court continue the
11 case management conference, currently calendered for April 21, 2010 at 1:30 p.m., before
12 Magistrate Judge Chen, for 90 days.

13 So Stipulated:

14 Lanak & Hanna, P.C.

15
16 Dated: April 19, 2010

17 By: /s/ Robert Stroj
18 Robert Stroj
19 Attorneys for American Contractors Indemnity Company

20 Katzenbach & Khtikian

21 Dated: April 19, 2010

22 By: /s/ Kent Khtikian
23 Kent Khtikian
24 Attorneys for Plaintiffs

25 **Attestation Of Concurrence**

26 I, Kent Khtikian, declare that Robert Stroj has signed the Stipulation set forth above and
27 that I have in my possession their signatures on this document.

28 I declare under penalty of perjury that the foregoing is true and correct.

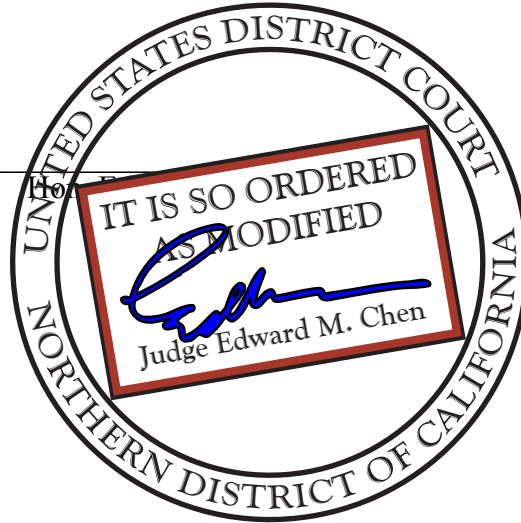
Executed this 20th day of April 2010, in San Francisco, California.

/s/ Kent Khtikian
Kent Khtikian

ORDER

It is hereby ordered that the case management conference in this matter currently scheduled for April 21, 2010 shall be continued to 7/28, 2010 at 1:30pm in Courtroom C, 15th Floor, 450 Golden Gate Avenue, San Francisco. A joint cmc statement shall be filed by 7/21/10.

Dated: 4/20/10



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28