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6 Attorney for Plaintiffs

7
 8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 BAY AREA PAINTERS AND TAPERS
 PENSION TRUST FUND, et al.,

11 Plaintiffs,

12 v.

13 AIC PAINTING CORPORATION, a California
 14 Corporation; MARK DALE BOHN,
 Individually and *dba* AIC PAINTING,

15 Defendants.

Case No: C11-0418 SI

**REQUEST TO CONTINUE CASE
 MANAGEMENT CONFERENCE;
 PLAINTIFFS’ CASE MANAGEMENT
 CONFERENCE STATEMENT;
 [PROPOSED] ORDER THEREON**

Date: May 13, 2011

Time: 2:30 p.m.

Ctrm: 10, 19th Floor

Judge: The Honorable Susan Illston

18 Plaintiffs herein respectfully submit their Case Management Statement, requesting that the
 19 Case Management Conference, currently on calendar for May 13, 2011, be continued for
 20 approximately 60–90 days, as follows:

21 1. As the Court’s records will reflect, a Complaint was filed in this action on January
 22 28, 2011 for contributions due to the Trust Funds for work performed by Defendants’ employees.

23 2. Defendants have requested a payment plan to satisfy the amounts due. Plaintiffs
 24 are currently drafting said payment plan which will be in the form of a Stipulated Judgment
 25 (“Stipulation”), and anticipate filing the Stipulation with the Court within approximately thirty
 26 (30) days.

27 3. Defendants have retained counsel, who has yet to appear. Plaintiffs agreed to
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1 extend the time to respond in anticipation of resolving this matter.

2 4. There are no issues that need to be addressed at the currently scheduled Case
3 Management Conference. In the interest of conserving costs as well as the Court's time and
4 resources, Plaintiffs respectfully request that the Case Management Conference, currently
5 scheduled for May 13, 2011, be continued for approximately 60-90 days to allow for the
6 preparation, review, execution and filing of the Stipulation.

7

8 Dated: May 4, 2011

SALTZMAN & JOHNSON
LAW CORPORATION

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By: /S/Michele R. Stafford

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Michele R. Stafford
Attorneys for Plaintiffs

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IT IS SO ORDERED.

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Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case
Management Conference is hereby continued to August 12, 2011. All related
deadlines are extended accordingly.

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Date: 5/5/11



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THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE

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1 PROOF OF SERVICE

2 I, the undersigned, declare:

3 1. I am a citizen of the United States and am employed in the County of San
4 Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San
5 Francisco, California 94104.

6 2. I am over the age of eighteen and not a party to this action.

7 3. May 4, 2011, I served the following document(s):

8 **REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE;**
9 **PLAINTIFFS' CASE MANAGEMENT CONFERENCE STATEMENT;**
10 **[PROPOSED] ORDER THEREON**

11 on the interested parties in said action by enclosing a true and exact copy of each document in a
12 sealed envelope and placing the envelope for collection and mailing following our ordinary
13 business practices. I am readily familiar with this business' practice for collecting and processing
14 correspondence for mailing. On the same day that correspondence is placed for collection and
15 mailing, it is deposited in the ordinary course of business with the United States Postal Service in
16 a sealed envelope with First Class postage fully prepaid.

17 4. The envelope(s) were addressed and sent via First Class U.S. Mail as follows:

18 **Dawna J. Cilluffo, Esq.**
19 **DC Law**
20 **2005 De La Cruz Blvd., Suite 215**
21 **Santa Clara, California 95050**

22 I declare under penalty of perjury that the foregoing is true and correct and that this
23 declaration was executed on this 4th day of May, 2011, at San Francisco, California.

24 /S/ Vanessa de Fabrega
25 Vanessa de Fabrega
26 Paralegal