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6 Attorneys for Plaintiffs

7  
 8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 BAY AREA PAINTERS AND TAPERS  
 PENSION TRUST FUND, and its JOINT  
 11 BOARD OF TRUSTEES; LES PROTEAU and  
 CHARLES DEL MONTE, TRUSTEES,

12 Plaintiffs,

13 v.

14 OAKTOWN CONSTRUCTION, INC., a  
 California corporation; and JOSIE RAGAS  
 15 McFARLANE, individually,

16 Defendants.  
 17

Case No.: C11-0483 SI

**REQUEST FOR CONTINUANCE OF  
 CASE MANAGEMENT CONFERENCE**

Date: May 13, 2011

Time: 2:30 p.m.

Courtroom: 10, 19<sup>th</sup> Floor

450 Golden Gate Avenue  
 San Francisco, CA 94102

Judge: The Honorable Susan Illston

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 19 Plaintiffs respectfully request that the Case Management Conference currently scheduled  
 20 for May 13, 2011, at 2:30 p.m., be continued for approximately 60 - 90 days, as follows:

21 1. A Complaint was filed in this action on February 1, 2011 for contributions due to  
 22 the Trust Funds for work performed by Defendants' employees.

23 2. Defendants have paid a portion of the contributions due, and have requested a  
 24 payment plan to satisfy the remaining balance. The payment plan will be in the form of a  
 25 Stipulated Judgment ("Stipulation"). Plaintiffs are in the process of preparing the Stipulation.

26 3. Plaintiffs have also granted an extension for Defendants to file an Answer, in  
 27 anticipation of the matter being resolved by Stipulation.

28 4. The parties estimate that the Stipulated Judgment will be filed in the next thirty

-1-

**REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE**

**Case No.: C11-0483 SI**

1 (30) days.

2 5. Therefore, Plaintiffs respectfully request that the Case Management Conference be  
3 continued for approximately 60 - 90 days in order to allow preparation, review, and signature of  
4 the Stipulated Judgment.

5 Date: May 3, 2011

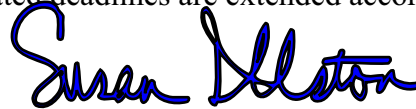
SALTZMAN & JOHNSON  
LAW CORPORATION

7 By: \_\_\_\_\_/s/\_\_\_\_\_  
8 Michele R. Stafford  
9 Attorneys for Plaintiffs

10  
11 ORDER

12 The Case Management Conference currently scheduled for May 13, 2011 at 2:30 p.m. is hereby  
13 continued to 7/8/11. All related deadlines are extended accordingly.

14  
15 Date: 5/4/11



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UNITED STATES DISTRICT COURT JUDGE

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PROOF OF SERVICE:

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On May 3, 2011, I served the following document(s):

**REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE**

on the interested parties in said action by First Class U.S. Mail by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

*Attorneys for Defendant:*

**Patricia Walsh, Esq.  
Leonidou & Rosin Professional Corporation  
777 Cuesta Drive, Suite 200  
Mountain View, California 94040**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 3rd day of May, 2011, at San Francisco, California.

\_\_\_\_\_  
/s/  
Qui X. Lu