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7 Attorneys for Plaintiffs

8 UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 10 (SAN FRANCISCO DIVISION)

11 AUTOMOTIVE INDUSTRIES PENSION
 TRUST FUND, BILL BRUNELLI, Trustee,
 12 JAMES H. BENO, Trustee, STEPHEN J.
 MACK, Trustee, CHRIS CHRISTOPHERSEN,
 13 Trustee, DON CROSATTO, Trustee, MARK
 HOLLIBUSH, Trustee, JON ROSELLE,
 14 Trustee, DOUGLAS CORNFORD, Trustee, and
 JAMES V. CANTERBURY, Trustee,

15 Plaintiffs,

16 v.

17 GOOD CHEVROLET, a California
 corporation,

18 Defendant.
 19

Case No.: CV 11-01381 EDL

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

Date: September 6, 2011
 Time: 10:00 a.m.
 Courtroom E, 15th Floor
 Magistrate Judge: Elizabeth D. Laporte

20 Plaintiffs herein respectfully request that the Case Management Conference currently on
 21 calendar for September 6, 2011 at 10:00 a.m., be continued or vacated entirely, in anticipation of a
 22 filing of a Motion for Default Judgment by Plaintiffs.

23 1. A Complaint was filed in this matter on March 23, 2011, to recover withdrawal
 24 liability owed by Defendant Good Chevrolet, a California Corporation (“Defendant”) pursuant to
 25 the Employee Retirement Income Security Act of 1974 (ERISA) as amended by the Multi-
 26 Employer Pension Plan Amendments Act of 1980 (MPPAA).
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 28

1 2. An Order Granting Plaintiffs' Ex Parte Application for An Order Allowing for
2 Service of Summons Upon the Secretary of State and Continue Initial Case Management
3 Conference was issued on June 13, 2011. (Dkt. No. 12)

4 3. Pursuant to said Order filed on June 13, 2011, the Case Management Conference
5 was rescheduled to 10:00 a.m. on September 6, 2011.

6 4. Service of the Summons, Complaint and Order Granting Plaintiffs' Ex Parte
7 Application for An Order Allowing for Service of Summons Upon the Secretary of State and
8 Continue Initial Case Management Conference on Defendant was effectuated on June 15, 2011.
9 Record of Service of Process by California Secretary of State was filed with the Court on June 28,
10 2011. (Dkt. No. 14)

11 5. To date, Defendant has failed to plead or otherwise defend or appear in this action.

12 6. Plaintiffs filed a Request for Entry of Default on July 19, 2011. (Dkt. No. 15). The
13 Clerk entered the Defendants' default on July 21, 2011. (Dkt. No. 16)

14 7. Plaintiffs will prepare a Motion for Default Judgment which they anticipate filing
15 with the Court by September 16, 2011, and it will be noticed to be heard on Tuesday, October 25,
16 2011, at 9:00 a.m. Plaintiffs are requesting a continuance of the Case Management Conference to
17 prepare the Motion for Default Judgment.

18 8. There are no issues that need to be addressed at the currently scheduled Case
19 Management Conference. In the interest of conserving costs as well as the Court's time and
20 resources, Plaintiffs respectfully request that the Case Management Conference, currently
21 scheduled for September 6, 2011, be vacated, or in the alternative be continued to Tuesday,
22 October 25, 2011, to coincide with the hearing on the Motion for Default Judgment.

23 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above
24 entitled action, and that the foregoing is true of my own knowledge.

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Executed this 8th day of August, 2011, at San Francisco, California.

SALTZMAN & JOHNSON LAW CORPORATION

By: _____ /S/
Julie Ostil
Attorneys for Plaintiffs

IT IS SO ORDERED.

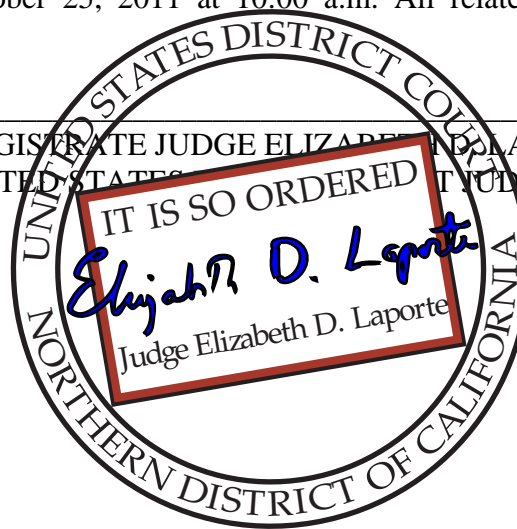
Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby vacated.

or

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to coincide with the hearing on Plaintiffs' Motion for Default Judgment on Tuesday, October 25, 2011 at 10:00 a.m. All related deadlines are extended accordingly.

Date: August 11, 2011

MAGISTRATE JUDGE ELIZABETH D. LAPORTE
UNITED STATES DISTRICT COURT



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PROOF OF SERVICE

I, the undersigned, declare:

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

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

3. On **August 8, 2011**, I served the following document(s):

**REQUEST TO CONTINUE OR VACATE CASE MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

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

4. The envelopes were addressed and mailed as follows:

John F. Buono, Jr.
Registered Agent for Service of Process
Good Chevrolet
1237 Ballena Blvd.
Alameda, CA 94501

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **August 8, 2011**, at San Francisco, California.

_____/S/
Barbara Savino
Paralegal