

1 Muriel B. Kaplan, Esq. (SBN 124607)
2 Michele R. Stafford, Esq. (SBN 172509)
3 SALTZMAN & JOHNSON LAW CORPORATION
4 44 Montgomery Street, Suite 2110
5 San Francisco, CA 94104
6 (415) 882-7900
7 (415) 882-9287—Facsimile
8 mkaplan@sjlawcorp.com
9 mstafford@sjlawcorp.com

10 Attorneys for Plaintiffs

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 NORTHERN CALIFORNIA GLAZIERS,
11 ARCHITECTURAL METAL AND GLASS
12 WORKERS PENSION PLAN, et al.

13 v.
14 Plaintiffs,

15 REZA JAFARI FARAHANI *aka* RAY
16 JAFARI FARAHANI, *dba* LINCOLN GLASS
17 & MIRROR; UNITED BUILDERS
18 CORPORATION, *dba* LINCOLN GLASS &
19 MIRROR CO.,

20 Defendants.

Case No.: C11-2631 EMC

**JOINT CASE MANAGEMENT
STATEMENT and JOINT REQUEST FOR
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE; and
[PROPOSED] ORDER THEREON
ORDER RESETTING CMC**

Date: September 19, 2011

Time: 10:00 a.m.

Ctrm: 5, 17th Floor

Judge: The Honorable Edward M. Chen

21 The parties herein respectfully submit their Joint Case Management Statement and joint
22 request to continue the Case Management Conference, currently on calendar for September 19,
23 2011, for approximately 30 days.

24 1. As the Court's records will reflect, this action was filed on June 2, 2011. Service on
25 Defendants was effectuated on July 29, 2011. A Proof of Service of Summons was filed with the
26 Court on August 3, 2011. [Docket No. 9.]

27 2. On August 19, 2011, Defendants filed an Answer to the Complaint. [Docket Nos.
28 10, 11.]

3. On August 24, 2011, the case was referred to Mediation, pursuant to the Court's
Order. [Docket No. 15.]

1 4. The parties are currently attempting to reach settlement with the goal of resolving
2 this matter without the further intervention of the Court. Accordingly, the parties herein
3 respectfully request that the Case Management Conference, currently scheduled for September 19,
4 2011, be continued for 30 days to allow the parties to continue their negotiations, and for
5 Mediation to place.

6 5. There are no issues that need to be addressed by the parties at the currently
7 scheduled Case Management Conference. In the interest of conserving costs as well as the Court's
8 time and resources, the parties respectfully request that the Court continue the currently scheduled
9 Case Management Conference.

10 | Respectfully submitted,

11 | Dated: September 9, 2011

**SALTZMAN & JOHNSON
LAW CORPORATION**

13 By: /S/Michele R. Stafford
14 Michele R. Stafford
Attorneys for Plaintiffs

Dated: September 9, 2011 **OMNI LAW GROUP, LLP**

/S/Trevor J. Zink
Trevor J. Zink
Attorneys for Defendants

20 IT IS SO ORDERED.

21 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case
22 Management Conference is hereby continued to 10/28/11 at 9:00, and all previously vacated
deadlines and dates related to this case may be reset at that Conference.

24 | Date: 9/14/11

