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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

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F.G. CROSTHWAITE and RUSSELL E.  
 BURNS, in their respective capacities as  
 Trustees, of the OPERATING ENGINEERS’  
 HEALTH AND WELFARE TRUST FUND  
 FOR NORTHERN CALIFORNIA;

Plaintiffs,

v.

COOPER CRANE & RIGGING, INC., *dba*  
 ASSOCIATED DOCK ENTERPRISES, INC.;  
 and *dba* WESTERN DOCK ENTERPRISES,  
 California Corporations,

Defendants.

Case No.: C11-2866 JSW

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

Date: September 23, 2011

Time: 1:30 p.m.

Ctrm: 11, 19<sup>th</sup> Floor

Judge: The Honorable Jeffrey S. White

21 Plaintiffs herein respectfully submit their Case Management Statement, requesting that the  
 22 Case Management Conference, currently on calendar for September 23, 2011, be vacated, or in the  
 23 alternative be continued to coincide with the date set for the Motion.

24 1. As the Court’s records will reflect, a Complaint was filed in this matter on June 10,  
 25 2011, to compel Defendants’ compliance with their obligations under the Collective Bargaining  
 26 Agreements to which they are signatory.

27 2. Service on Defendants was effectuated on June 14, 2011, and a Proof of Service of  
 28 Summons was filed with the Court on June 21, 2011.

1 3. On July 21, 2011, the Court entered the default of Defendants.

2 4. On August 26, 2011, Plaintiffs filed a Motion for Default Judgment with  
3 supporting Declarations.

4 5. On August 29, 2011, Plaintiffs' Motion for Default Judgment was referred to  
5 Magistrate Judge Laurel Beeler for Report and Recommendation.

6 6. There are no issues that need to be addressed at the currently scheduled Case  
7 Management Conference. In the interest of conserving costs as well as the Court's time and  
8 resources, Plaintiffs respectfully request that the Case Management Conference, currently  
9 scheduled for September 23, 2011, be vacated, or in the alternative be continued to coincide with  
10 the date set for the Motion.

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

13 Executed this 13th day of September, 2011, at San Francisco, California.

14 SALTZMAN & JOHNSON  
15 LAW CORPORATION

16 By: /s/Michele R. Stafford  
17 Michele R. Stafford  
18 Attorneys for Plaintiffs

19 ORDER

20 IT IS SO ORDERED.

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

23 ~~or~~

24 ~~Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case  
25 Management Conference is hereby continued to \_\_\_\_\_ . All related  
26 deadlines are extended accordingly.~~

27 Date: September 14, 2011

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\_\_\_\_\_  
THE HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT COURT