1 2 3 4 5	RICHARD C. JOHNSON (SBN 40881) SHAAMINI A. BABU (SBN 230704) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 San Francisco, CA 94104 (415) 882-7900 (415) 882-9287 – Facsimile djohnson@sjlawcorp.com sbabu@sjlawcorp.com				
6	Attorneys for Plaintiffs				
7	UNITED STATES DISTRICT COURT				
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA				
9	PENSION TRUST FUND FOR OPERATING ENGINEERS; et al.,	Case No.:	CV 11-3285 LB		
10		JOINT CASE MANAGEMENT         Plaintiffs,         JOINT CASE MANAGEMENT         STATEMENT AND REQUEST TO         APPEAR TELEPHONICALLY;         [PROPOSED] ORDER THEREON			
11	VS.				
12	CHEVREAUX AGGREGATES, INC., et al.,	Date:	August 2, 2012		
13		Time:	10:30 a.m.		
14	Defendants.	Ctrm:	4, 3rd Floor		
15		Judge:	The Honorable Laurel Beeler		
16					
17	Pursuant to this Court's Minute Order dated May 24, 2012, Plaintiffs and Defendant				
18	Martha E. Chevreaux, as Trustee for the Chevreau	ıx Family R	evocable Trust of 1973 and Martha		
19	E. Chevreaux Revocable Trust of 2004 (referred to	o herein col	lectively as "Defendants Chevreaux		
20	Trusts") hereby submit this Joint Case Management Statement and Request to Appear				
21	Telephonically at the Case Management Conference ("CMC") on August 2, 2012.				
22	1. Since the time the CMC was held on May 24, 2012, Defendants Chevreaux Trusts				
23	have provided additional documents to Plaintiffs that are revelvant to the determination of whether				
24	Defendants Chevreaux Trusts are members of the same control group as Defendant Chevreaux				
25	Aggregates, Inc., and the scope of the assets held by Defendants. Defendants intend to produce				
26	additional documents prior to the CMC on August 2, 2012.				
27	2. Plaintiffs and Defendant Martha E. Chevreaux Revocable Trust of 2004 anticipate				
28	entering into a stipulated judgment upon completin	g review of	additional documents.		

1	3.	Plaintiffs anticipate dismissing Chevreaux Family Revocable Trust of 1973 from
2	this action upo	completing review of additional documents.

3 4. Default was entered against Defendants Chevreaux Aggregates, Inc. and Chevreaux
4 Concrete, Inc. on August 10, 2011. Docket No. 14. Plaintiffs anticipate filing a motion for default
5 judgment against Defendants Chevreaux Aggregates, Inc. and Chevreaux Concrete, Inc. upon
6 completing review of additional documents.

5. Counsel for Plaintiffs and Defendants Chevreaux Trusts intend to appear at the
CMC calendared for August 2, 2012. In an effort to minimize attorneys' fees counsel for the
parties respectfully request to appear telephonically. The telephone number for Shaamini Babu,
Plaintiffs' counsel, is 415-321-2406. The telephone number for Dennis Murphy, Defendants
Chevreaux Trusts, is 916-329-3072.

12	12         Dated: July 26, 2012         SALTZMAN	& JOHNSON LAW CORPORATION	
13			
14	14 By: /s/ Shaamini A. I	Babu	
	Attorneys for		
15		USTIN ADAMS SCHOENFELD	
16			
17			
18	Dennis R. Mu Attorney, for	urphy Defendant Martha E. Chevreaux, as	
	Trustee for the	ne Chevreaux Family Revocable Trust of	
19	19 19/3 and M 2004	artha E. Chevreaux Revocable Trust of	
20	20		
21	ORDER		
22	BASED ON THE FOREGOING and GOOD CAUSE APPEARING, counsel for the		
23	parties are permitted to appear by phone for the Case Management Conference on August 2, 2012,		
	at 10.50 a.m. The court will initiate the call to Mis. Daba and Mit. Mulphy before their case is		
24	24	$\sim$	
25	25 IT IS SO ORDERED.	K	
26			
27	THE HONORABLE LAUREL BEELER UNITED STATES DISTRICT COURT JUDGE		
28	28		
		-2-	
		JOINT CMC STATEMENT	

Case No.: CV 11-3285 LB