et al v.	Fremont Paving Company, Inc. et al		Doc.	31		
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1 2 3 4 5	Michele R. Stafford, Esq. (SBN 172509) Blake E. Williams, Esq. (SBN 233158) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 San Francisco, CA 94104 (415) 882-7900 (415) 882-9287 – Facsimile <u>mstafford@sjlawcorp.com</u> <u>bwilliams@sjlawcorp.com</u>					
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11	Attorneys for Defendant Fremont Paving Company, Inc.					
12	UNITED STATES DISTRICT COURT					
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA					
14	F.G. CROSTHWAITE, et al.	Case No.: C11-4417-JSW				
15	Plaintiffs,	JOINT CASE MANAGEMENT				
16	v.	CONFERENCE STATEMENT and REQUEST TO CONTINUE CASE				
17	FREMONT PAVING COMPANY, INC., a California Corporation, et al.,	MANAGEMENT CONFERENCE; [PROPOSED] ORDER THEREON				
18	Defendants.	Date: August 3, 2012 Time: 1:30 p.m.				
19		Ctrm: 11, 19 th Floor				
20	Judge: Honorable Jeffrey S. White					
21	Defendant Fremont Paving Company, Inc. hereby joins in Plaintiffs' previously filed					
22	Request to Continue Case Management Statement. The parties jointly request that the Case					
23	Management Conference, currently on calendar for August 3, 2012, be continued to allow					
24	Plaintiffs to file their Motions for Summary Judgment and Default Judgment respectfully.					
25	1. Plaintiffs have made several offers to resolve this matter by payment plan.					
26	Defendants are unable to commit to any resolution at the current time. Defendants are aware that					
27	Plaintiffs must move this matter forward by filing dispositive Motions.					
28	2. There are no issues that need to be addressed at the currently scheduled Case					
	-1- JOINT CMC STATEMENT AND REQUEST TO CONTINUE CMC; PROPOSED ORDER Case No.: C11-4417-JSW P:\CLIENTS\OE3CL\Fremont Paving Company Inc\Pleadings\C11-4417-JSW - JOINT Request to Continue CMC - 073112.DOC					
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Management Conference. In the interest of conserving costs as well as the Court's time and
resources, Plaintiffs respectfully request that the Case Management Conference, currently
scheduled be continued for 60 days.

5	scheduled be continued for oo days.					
4	Dated: July 31, 2012 SALTZMAN & JOHNSON LAW CORPORATION					
5 6 7 8 9 10	By: /S/ Michele R. Stafford Attorneys for Plaintiffs Dated: July 31, 2012 CAREY & CAREY, A LAW CORPORATION By: /S/					
11	Robert E. Carey, Jr. Attorneys for Defendant Fremont Paving Company, Inc.					
12 13	IT IS SO ORDERED.					
14	Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case					
15	Management Conference is hereby continued to <u>October 5, 2012 at 1:30 p.m.</u> . All related					
16	deadlines are extended accordingly.					
17	And River					
18 19	Date: August 1, 2012 THE HOLOBABLE JEFFREY S. WHITE					
20	UNITED STATES DISTRICT COURT JUDGE					
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	-2- JOINT CMC STATEMENT AND REQUEST TO CONTINUE CMC; PROPOSED ORDER Case No.: C11-4417-JSW P:\CLIENTS\OE3CL\Fremont Paving Company Inc\Pleadings\C11-4417-JSW - JOINT Request to Continue CMC - 073112.DOC					