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10 Attorneys for Defendants

12 UNITED STATES DISTRICT COURT
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 NORTHERN CALIFORNIA GLAZIERS,
 ARCHITECTURAL METAL AND GLASS
 15 WORKERS PENSION PLAN, et al.

16 Plaintiffs,

17 v.

18 HOSSEIN VAHEID, individually and *dba*
 UNITED GLASS & ALUMINUM; *aka* T P
 19 WINDOWS, INC., a California corporation,

20 Defendants.

Case No.: C11-5116 SC

**JOINT REQUEST FOR CONTINUANCE
 OF CASE MANAGEMENT
 CONFERENCE; and ~~PROPOSED~~
 ORDER THEREON**

Date: Friday, February 7, 2014
 Time: 10:00 a.m.
 Ctrm: 1, 17th Floor
 450 Golden Gate Avenue
 San Francisco, California
 Judge: The Honorable Samuel Conti

22 Plaintiffs and Defendants both respectfully request that the Case Management
 23 Conference scheduled for February 7, 2014, at 10:00 a.m., be continued for approximately forty-
 24 five (45) to sixty (60) days, as follows:

- 25 1. The Parties recognize that this Court has granted several continuances of the Case
 26 Management Conference. During this time, the Parties have attempted to work together to resolve
 27 several outstanding discrepancies with regard to the results of an audit taken of Defendants’
 28 payroll records.

1 2. On September 30, 2013, the parties participated in mediation. The case did not
2 settle at the mediation, but the parties continued settlement discussions thereafter, with the
3 assistance of the mediator, in an attempt to resolve this dispute.

4 3. Defendants have since made a proposal of a potential amount to be paid under a
5 settlement agreement, which Plaintiffs will evaluate at the next meeting of the Board of Trustees
6 in February 2014. The parties have discussed certain other conditions for settlement which will
7 need to be met, including the need for an audit of Defendant's records.

8 3. Plaintiffs and Defendants herein respectfully request that the Case Management
9 Conference, currently scheduled for February 7, 2014, be continued for forty-five (45) to sixty
10 (60) days to allow the Plaintiffs to evaluate Defendants' settlement proposal at the next meeting of
11 the Board of Trustees and to allow the parties to discuss the audit and other conditions of
12 settlement.

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1 4. There are no issues that need to be addressed by this Court at the currently
2 scheduled Case Management Conference. In the interest of conserving costs as well as the Court's
3 time and resources, both parties respectfully request that the Court continue the currently
4 scheduled Case Management Conference.

5 Dated: January 31, 2014

**SALTZMAN & JOHNSON
LAW CORPORATION**

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7 By: _____ /S/
Shivani Nanda
8 Attorneys for Plaintiffs

9 Dated: January 31, 2014

**LEONIDOU & ROSIN
PROFESSIONAL CORPORATION**

10
11 By: _____ /S/
Patricia Walsh
12 Attorneys for Defendants

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 04/04/2014, and all related deadlines are
16 extended accordingly.

17 Date: 02/03/2014



18 THE HONORABLE SAMUEL CONTI
19 UNITED STATES DISTRICT COURT
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