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 8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 10 (SAN FRANCISCO DIVISION)

11 SERVICE EMPLOYEES INTERNATIONAL
 UNION NATIONAL INDUSTRY PENSION
 12 FUND; STEPHEN ABRECHT, Trustee;
 RODERICK S. BASHIR, Trustee; KEVIN J.
 13 DOYLE, Trustee; DAVID A. STILWELL,
 Trustee; STEVEN W. FORD, Trustee;
 14 LARRY T. SMITH, Trustee; FRANK A.
 MAXSON, Trustee; EDWARD MANKO,
 Trustee; JOHN J. SHERIDAN, Trustee; and
 15 MYRIAM
 ESCAMILLA, Trustee,
 16
 17 Plaintiffs,
 18 vs.
 19 U.S. METRO GROUP, INC., a California
 corporation,
 20 Defendant.

CASE NO.: CV 11-05711 MEJ

**REQUEST FOR CONTINUANCE OF
 CASE MANAGEMENT CONFERENCE
 AND ~~PROPOSED~~ ORDER**

Date: Thursday, March 15, 2012
 Time: 10:00 a.m.
 Judge: Magistrate Judge Maria-Elena James
 Courtroom B. 15th Floor
 450 Golden Gate Ave.
 San Francisco, CA

21
 22 Plaintiffs hereby submit their Request for Continuance of the Case Management
 23 Conference currently scheduled for Thursday, March 15, 2012 at 10:00 a.m.

- 24 1. The Complaint in this matter was filed on November 29, 2012 for Defendant's
 25 failure to pay employee pension contributions owing to Plaintiff Service Employees
 26 International Union National Industry Pension Fund.
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2. On February 15, 2012, Defendant U.S. Metro Group, Inc. executed a waiver of the service of summons. On February 23, 2012, the executed waiver of service of summons was filed with the Court (Docket No. 4). Pursuant to the filed waiver of service of summons, Defendant's response to the complaint is due by April 16, 2012.

3. The parties are currently in settlement discussions concerning Defendant's liability to the Pension Fund.

4. The parties hope to resolve all of the above issues and reach settlement of this matter within the next sixty (60) days.

5. Therefore, there is nothing for the Court to consider at this time.

6. Plaintiffs therefore respectfully request that, in order to minimize costs and fees in this action and allow the parties to finalize settlement of this matter, the Case Management Conference be continued for a period of at least sixty (60) days.

Date: March 5, 2012


SALTZMAN & JOHNSON LAW CORPORATION

By: _____ /S/
Kimberly A. Hancock
Attorneys for Plaintiffs

IT IS SO ORDERED.

Based on the foregoing, and for GOOD CAUSE appearing, the Case Management Conference currently set for Thursday, March 15, 2012 at 10:00 a.m. is hereby continued to May 24, 2012 at 10:00 a.m.

Date: March 6, 2012



The Honorable Maria-Elena James
Magistrate Judge, United States District Court

1 PROOF OF SERVICE

2 I, the undersigned, declare:

3 I am employed in the County of San Francisco, State of California. I am over the age of
4 eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110,
5 San Francisco, California 94104.

6 On March 5, 2012, I served the document listed below on the parties to this action,
7 addressed as follows, in the manner described below:

8 REQUEST FOR CONTINUANCE OF
9 CASE MANAGEMENT CONFERENCE
AND [PROPOSED] ORDER THEREON

10 XX MAIL, being familiar with the practice of this office for the collection and the processing
11 of correspondence for mailing with the United States Postal Service, and deposited in the
12 United States Mail copies of the same to the business addresses set forth below, in a sealed
envelope fully prepared.

13 XX E-MAIL: as a courtesy, I caused copies of the same to be sent to the persons listed below
14 at the respective e-mail addresses listed below. I did not receive, within a reasonable time
after the transmission, any electronic message or other indication that the transmission was
unsuccessful.

15 Addressed to:

16 A. Jay Norton, Esq.
17 Law Offices of A. Jay Norton
18 Attorney for Defendant U.S. Metro Group
4010 Watson Plaza Drive, Suite 270
19 Lakewood, CA 90712
Email: ajaynorton@yahoo.com

20 I declare under penalty of perjury that the foregoing is true and correct and that this
21 declaration was executed this 5th day of March, 2012, at San Francisco, California.

22
23 _____ /S/
24 Julie Jellen