

1 Michele R. Stafford, Esq. (SBN 172509)
 Blake E. Williams, Esq. (SBN 233158)
 2 SALTZMAN & JOHNSON LAW CORPORATION
 44 Montgomery Street, Suite 2110
 3 San Francisco, CA 94104
 Tel: (415) 882-7900
 4 Facsimile: (415) 882-9287
mstafford@sjlawcorp.com
bwilliams@sjlawcorp.com
 5

6 Attorneys for Plaintiffs

7
8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 F. G. CROSTHWAITE, et al., as Trustees of the
OPERATING ENGINEERS' HEALTH AND
11 WELFARE TRUST FUND, et al.

12 Plaintiffs,

13 v.

14 ROSS ISLAND SAND & GRAVEL CO., a
California corporation, *aka* ROSS ISLAND,
15 INC.,

16 Defendant.

Case No.: C12-1464 CRB

**REQUEST TO VACATE, OR IN THE
ALTERNATIVE, CONTINUE CASE
MANAGEMENT CONFERENCE**

Date: Friday, September 14, 2012
 Time: 8:30 a.m.
 Location: Courtroom 6, 17th Floor
 450 Golden Gate Avenue
 San Francisco, California
 Judge: The Honorable Charles R. Breyer

17
18 Plaintiffs herein respectfully request that the Case Management Conference currently on
19 calendar for Friday, September 14, 2012 at 8:30 a.m. be vacated, or in the alternative, be continued
20 for 90 (ninety) days as follows:

21 1. As the Court's records will reflect, this action was filed on March 23, 2012 to
22 compel Defendant's compliance with the terms of their Collective Bargaining Agreement. Service
23 on Defendant was completed on March 30, 2012. A Proof of Service of Summons was filed with
24 the Court on April 12, 2012. [*Docket No. 9.*]

25 2. On May 16, 2012, default was entered against Defendant in this matter. [*Docket*
26 *No. 12.*]

27
28

