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9 Attorneys for Defendants SOL HEALTHCARE, LLC;
 SOLNUS TWO, LLC; SOLNUS THREE, LLC;
 10 SOLNUS FOUR, LLC; SOLNUS EIGHT, LLC; SOL
 MAJER; and SHLOMO RECHNITZ

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13

14 SERVICE EMPLOYEES INTERNATIONAL)
 UNION NATIONAL INDUSTRY PENSION)
 15 FUND; STEPHEN ABRECHT, Trustee, ROD)
 BASHIR, Trustee; KEVIN J. DOYLE, Trustee;)
 16 MYRIAM ESCAMILLA, Trustee; STEVEN W.)
 FORD, Trustee; EDWARD J. MANKO,)
 17 Trustee; FRANK A. MAXSON, Trustee; JOHN)
 J SHERIDAN, Trustee; LARRY T. SMITH,)
 18 Trustee; DAVID STILWELL, Trustee,)

Case No.: CV 12 4494 JST

**JOINT STIPULATION TO CONTINUE
 CASE MANAGEMENT
 CONFERENCE; and [PROPOSED] ORDER**

19 Plaintiff,)
 20 vs.)
 21 EMPLOYEE EQUITY ADMINISTRATION,)
 INC., a California corporation, d/b/a Westline)
 22 Medical Management, et al.)
 23 Defendants.)

Date: September 4, 2013
 Time: 2:00 p.m.
 Judge: Hon. Jon S. Tigar
 Location: Courtroom 9, 19th Floor
 450 Golden Gate Ave.
 San Francisco, California

**First Amended
 Complaint filed: May 16, 2013
 Trial Date: June 30, 2014**

1 Plaintiffs Service Employees International Union National Industry Pension Fund, Stephen
2 Abrecht, Rod Bashir, Kevin J. Doyle, Myriam Escamilla, Steven W. Ford, Edward J. Manko, Frank A.
3 Maxson, John J. Sheridan, Larry T. Smith, and David Stillwell (collectively, the “Plaintiffs”), the
4 Westline Defendants (which includes Defendants Employee Equity Administration, Inc., Oak Facility,
5 Inc., RCC Facility, Inc., RV Facility, Inc., SP Facility, Inc., SJ Facility, Inc., Pleasant View
6 Convalescent Hospital, Inc., Willow Street Properties, LLC, Northgate Center, Inc., Jaline, Inc., Skilled
7 Logic Systems, Jack Easterday, and Deline Davis), and the Solnus Defendants (which include Sol
8 Healthcare, LLC, SOLNUS TWO, LLC, SOLNUS THREE, LLC, SOLNUS FOUR, LLC, SOLNUS
9 EIGHT, LLC, Sol Majer, and Shlomo Rechnitz), (collectively, the “Parties”), hereby stipulate as
10 follows:

11 1. A Case Management Conference is currently scheduled for September 4, 2013, pursuant
12 to Docket No. 46.

13 2. This Court previously ordered Mediation to occur pursuant to Docket No. 38. Such
14 Mediation is scheduled to occur on September 25, 2013, at this Court’s ADR Unit in San Francisco,
15 California. The Parties believe that it would be more efficient and cost effective to conduct the initial
16 Case Management Conference with Judge Tigar after the Mediation occurs.

17 3. The Parties jointly request that the Case Management Conference be continued to the next
18 available date for the Parties after the Mediation, which is October 9, 2013, or as soon thereafter (except
19 for October 16, October 23, or October 30, when the parties are unavailable) when this Court is next
20 available. Please note that the parties are also not available on October 3, 2013.

21 4. The Parties request that the Joint Case Management Conference Statement be submitted to
22 the Court ten court days before the new Case Management Conference date.

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1 IT IS SO STIPULATED.

2 Date: August 21, 2013

JACKSON LEWIS LLP

3
4 By: _____ /S/ _____

5 DAVID R. JOHANSON

6 Attorneys for Defendants Sol Healthcare LLC,
7 Solnus Two, LLC; Solnus Three, LLC;
8 Solnus Four, LLC; Solnus Eight, LLC; Sol Majer; and
9 Shlomo Rechnitz

10 Date: August 21, 2013

SALTZMAN & JOHNSON LAW CORPORATION

11
12 By: _____ /S/ _____

13 Kimberly A. Hancock

14 Attorneys for Plaintiffs

15
16 Date: August 21, 2013

17 By: _____ /S/ _____

18 SHELLEY R. BUCHANAN

19 Attorneys for Defendants Employee Equity
20 Administration, Inc., et al.

21
22 **PROPOSED ORDER**

23 The terms of the Stipulation herein above are hereby approved and adopted.

24 The Case Management Conference currently scheduled for September 4, 2013, is hereby continued
25 to ~~October 9, 2013~~ November 6, 2013, at 2:00 p.m. The Parties shall file with this Court a Joint Statement ten (10) court
26 days prior to that date. IT IS SO ORDERED.

27 _____ August 22, 2013

28 
District Court Judge Joe S. Tigar