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

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14

15 SERVICE EMPLOYEES INTERNATIONAL)
 UNION NATIONAL INDUSTRY PENSION)
 16 FUND; STEPHEN ABRECHT, Trustee, ROD)
 BASHIR, Trustee; KEVIN J. DOYLE, Trustee;)
 17 MYRIAM ESCAMILLA, Trustee; STEVEN W.)
 FORD, Trustee; EDWARD J. MANKO,)
 18 Trustee; FRANK A. MAXSON, Trustee; JOHN)
 J SHERIDAN, Trustee; LARRY T. SMITH,)
 19 Trustee; DAVID STILWELL, Trustee,)
)
 20 Plaintiff,)
)
 21 vs.)
)
 22 EMPLOYEE EQUITY ADMINISTRATION,)
 INC., a California corporation, d/b/a Westline)
 23 Medical Management, et al.)
)
 24 Defendants.)
)
 25)
 26)
 27)
 28)

Case No.: CV 12 4494 JST

**REQUEST FOR AN EXTENSION OF TIME
 TO FILE CASE MANAGEMENT
 CONFERENCE STATEMENT; and
 [PROPOSED] ORDER**

Date: November 6, 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 Defendants Sol Healthcare, LLC, Solnus Two, LLC, Solnus Three, LLC, Solnus Four, LLC,
2 Solnus Eight, LLC, Sol Majer, and Shlomo Rechnitz (collectively, the “Solnus Defendants”), hereby
3 request a five (5) day extension of time to file their Case Management Conference Statement on or
4 before Monday, October 28, 2013, and state as follows:

5 1. A Case Management Conference is currently scheduled in this case for November 6, 2013.

6 2. The Joint Case Management Conference Statement is due on October 23, 2013, pursuant
7 to Docket No. 49.

8 3. Due to unforeseen circumstances involving court appearances and other client matters for
9 counsel for the Solnus Defendants, the Solnus Defendants request a few extra days in order to review the
10 proposed Joint Case Management Conference Statement circulated on October 22, 2013, by counsel for
11 Plaintiffs Service Employees International Union National Industry Pension Fund, Stephen Abrecht, Rod
12 Bashir, Kevin J. Doyle, Myriam Escamilla, Steven W. Ford, Edward J. Manko, Frank A. Maxson, John J.
13 Sheridan, Larry T. Smith, and David Stillwell (collectively, the “Plaintiffs”).

14 4. The Solnus Defendants request that the Joint Case Management Conference Statement be
15 submitted to the Court on Monday, October 28, 2013.

16 5. Counsel for Plaintiffs and the Westline Defendants (which includes Defendants Employee
17 Equity Administration, Inc., Oak Facility, Inc., RCC Facility, Inc., RV Facility, Inc., SP Facility, Inc., SJ
18 Facility, Inc., Pleasant View Convalescent Hospital, Inc., Willow Street Properties, LLC, Northgate
19 Center, Inc., Jaline, Inc., Skilled Logic Systems, Jack Easterday, and Deline Davis) are aware that the
20 Solnus Defendants need additional time and, out of an abundance of caution, intend to file their Joint
21 Case Management Conference today, October 23, 2013.

22 6. In light of Plaintiffs and the Westline Defendants’ filing of their Joint Case Management
23 Conference Statement today, the Solnus Defendants believe they will not be prejudiced or burdened if the
24 court grants the Solnus Defendants an extension of time.

25 7. Furthermore, Plaintiffs and the Westline Defendants may ultimately join in on the Solnus
26 Defendants’ Case Management Conference Statement on or before October 28, 2013.

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28 ///

1 Date: October 23, 2013

JACKSON LEWIS LLP

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3 By: /s/ David R. Johanson
4 DAVID R. JOHANSON

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

9 **~~PROPOSED~~ ORDER**

10 The terms of the Request herein above are hereby approved and adopted.

11 The Case Management Conference Statement currently due on October 23, 2013, is hereby due on
12 October 28, 2013. IT IS SO ORDERED.

13 Dated: October 24, 2013

