	1 2 3 4 5 6	Richard K. Grosboll, State Bar No. 099729 Benjamin K. Lunch, State Bar No. 246015 NEYHART, ANDERSON, FLYNN & GROSBOLL 369 Pine Street, Suite 800 San Francisco, CA 94104 Tel. (415) 677-9440 Fax (415) 677-9445 Email: blunch@neyhartlaw.com Attorneys for Plaintiffs				
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	8	UNITED STATES DISTRICT COURT				
	9	NORTHERN DISTRICT OF CALIFORNIA				
	10 11	ELECTRICAL INDUSTRY SERVICE BUREAU, INC.; NORTHERN	Case No.	12-cv-06041-EMC		
	12	CALIFORNIA ELECTRICAL WORKERS PENSION TRUST; SAN FRANCISCO ELECTRICAL INDUSTRY	STIPULA	TION TO CONTINUE DATE		
	13	APPRENTICESHIP AND TRAINING TRUST; ELECTRICAL WORKERS		MOTIONS FOR SUMMARY NT; [PROPOSED] ORDER		
	14 15	HEALTH AND WELFARE TRUST; NATIONAL ELECTRIC BENEFIT FUND; INTERNATIONAL BROTHERHOOD OF	Judge:	Hon. Edward M. Chen		
	16	ELECTRICAL WORKERS LOCAL 6 VACATION FUND; INTERNATIONAL BROTHERHOOD OF ELECTRICAL	v auge.	Trom Burnara III Chan		
	17	WORKERS LOCAL 6; and TIM DONOVAN as Trustee of each of the				
	18	Plaintiff Trust Funds except the National Electrical Benefit Fund and as agent for				
	19	Plaintiff National Electrical Benefit Fund,				
	20	Plaintiffs, v.				
	2122	FARZAD GAUSI dba EUROPEAN QUALITY ELECTRIC,				
	23	Defendants.				
	24		I			
Neyhart, Anderson, Flynn &	25					
	26	STIPULATION TO CONTINUE I	OATE TO FILE	E MOTIONS FOR SUMMARY JUDGMENT		
GROSBOLL ATTORNEYS AT LAW	27	[PROPOSED] ORDER Case No. 12-cv-06041-EMC				
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2	<u>STIPULATION</u>		
3	WHEREAS, a settlement conference in the above-titled case has been set for August 13,		
4	2014, at 9:30 a.m. before the Honorable Elizabeth D. Laporte in the Northern District of		
5	California;		
6	WHEREAS, a case management conference has been set for August 28, 2014 at 1:30 p.m.		
7	before the Honorable Edward M. Chen in the Northern District of California;		
8 9	WHEREAS, the present deadline for filing motions for summary judgment is set for July		
10	24, 2014;		
11	WHEREAS, the parties understood that the Court had directed them to hold the settlement		
12	conference before filing motions for summary judgment;		
13	WHEREAS, prior counsel for the plaintiffs, Eileen Bissen, has left the Neyhart, Anderson,		
14	Flynn & Grosboll firm, and other attorneys in the firm need time to become fully familiar with the		
15	case;		
16 17	WHEREAS, counsel for the parties are in agreement that a continuation of the deadline for		
18	filing motions for summary judgment until after the August 28, 2014 case management conference		
19	is in the best interests of the Court and the parties;		
20	The parties, by and through their counsel, hereby stipulate to continue the deadline for		
21	filing motions for summary judgment, currently scheduled for July 24, 2014, to a date to be		
22	selected at the August 28, 2014 case management conference.		
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26	STIPULATION TO CONTINUE DATE TO FILE MOTIONS FOR SUMMARY JUDGMENT;		
27	[PROPOSED] ORDER		

NEYHART, ANDERSON, FLYNN & GROSBOLL ATTORNEYS AT LAW

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2	WE AGREE TO THE ABOVE	
3	Dated: July 21, 2014	NEYHART, ANDERSON, FLYNN & GROSBOLL
4		
5		/s/ Benjamin K. Lunch
6		BENJAMIN K. LUNCH, Attorney for Plaintiffs
7		
8	Dated: July 21, 2014	LAW OFFICES OF HAROLD M. JAFFE
9	Buted: 741, 2011	ETTW OTTICES OF IMMODE MINITE
10		/s/ Harold M. Jaffe
11		HAROLD M. JAFFE, Attorney for Defendant FARZAD GAUSI, dba European Quality Electric
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27	STIPULATION TO	CONTINUE DATE TO FILE MOTIONS FOR SUMMARY JUDGMENT [PROPOSED] ORDER

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NEYHART, ANDERSON, FLYNN & GROSBOLL ATTORNEYS AT LAW

[PROPOSED] ORDER

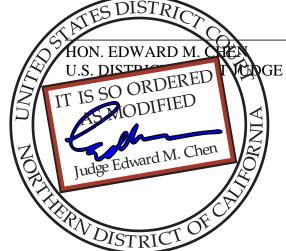
Having considered the parties' stipulation to continue the deadline for filing motions for summary judgment, and good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for filing motions for summary judgment is hereby continued to a date to be selected at the August 28, 2014 case management conference.

The August 28, 2014 CMC is reset scheduled to September 4, 2014 at 10:30 a.m. An updated joint CMC Statement shall be filed by August 28, 2014.

7/23/14

Dated:



NEYHART, ANDERSON, FLYNN & GROSBOLL

ATTORNEYS AT LAW

STIPULATION TO CONTINUE DATE TO FILE MOTIONS FOR SUMMARY JUDGMENT; [PROPOSED] ORDER

Case No. 12-cv-06041-EMC