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**Attorneys for Plaintiffs**

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 ELECTRICAL INDUSTRY SERVICE  
 11 BUREAU, INC.; NORTHERN  
 CALIFORNIA ELECTRICAL WORKERS  
 12 PENSION TRUST; SAN FRANCISCO  
 ELECTRICAL INDUSTRY  
 13 APPRENTICESHIP AND TRAINING  
 TRUST; ELECTRICAL WORKERS  
 14 HEALTH AND WELFARE TRUST;  
 NATIONAL ELECTRIC BENEFIT FUND;  
 15 INTERNATIONAL BROTHERHOOD OF  
 ELECTRICAL WORKERS LOCAL 6  
 16 VACATION FUND; INTERNATIONAL  
 BROTHERHOOD OF ELECTRICAL  
 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,

Case No. 12-cv-06041-EMC

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

Judge: Hon. Edward M. Chen

Plaintiffs,

v.

21 FARZAD GAUSI dba EUROPEAN  
 22 QUALITY ELECTRIC,

Defendants.

26 NEYHART,  
 ANDERSON,  
 FLYNN &  
 GROSBOLL  
 27 ATTORNEYS AT LAW

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

Case No. 12-cv-06041-EMC

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STIPULATION

WHEREAS, a settlement conference in the above-titled case has been set for August 13, 2014, at 9:30 a.m. before the Honorable Elizabeth D. Laporte in the Northern District of California;

WHEREAS, a case management conference has been set for August 28, 2014 at 1:30 p.m. before the Honorable Edward M. Chen in the Northern District of California;

WHEREAS, the present deadline for filing motions for summary judgment is set for July 24, 2014;

WHEREAS, the parties understood that the Court had directed them to hold the settlement conference before filing motions for summary judgment;

WHEREAS, prior counsel for the plaintiffs, Eileen Bissen, has left the Neyhart, Anderson, Flynn & Grosboll firm, and other attorneys in the firm need time to become fully familiar with the case;

WHEREAS, counsel for the parties are in agreement that a continuation of the deadline for filing motions for summary judgment until after the August 28, 2014 case management conference is in the best interests of the Court and the parties;

The parties, by and through their counsel, hereby stipulate to continue the deadline for filing motions for summary judgment, currently scheduled for July 24, 2014, to a date to be selected at the August 28, 2014 case management conference.

NEYHART,  
ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

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WE AGREE TO THE ABOVE

Dated: July 21, 2014

NEYHART, ANDERSON, FLYNN & GROSBOLL

/s/ Benjamin K. Lunch  
BENJAMIN K. LUNCH, Attorney for Plaintiffs

Dated: July 21, 2014

LAW OFFICES OF HAROLD M. JAFFE

/s/ Harold M. Jaffe  
HAROLD M. JAFFE, Attorney for Defendant  
FARZAD GAUSI, dba European Quality Electric

NEYHART,  
ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

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STIPULATION TO CONTINUE DATE TO FILE MOTIONS FOR SUMMARY JUDGMENT;  
[PROPOSED] ORDER  
Case No. 12-cv-06041-EMC

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[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.

Dated: 7/23/14

