Muriel B. Kaplan, Esq. (SBN 124607) Erica J. Russell, Esq. (SBN 274494) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 3 San Francisco, CA 94104 (415) 882-7900 (415) 882-9287 – Facsimile mkaplan@sjlawcorp.com erussell@sjlawcorp.com 5 Attorneys for Plaintiffs 6 7 UNITED STATES DISTRICT COURT 8 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA Case No.: C13-1782 SC BAY AREA PAINTERS AND TAPERS PENSION TRUST FUND, et al. 11 STIPULATION RE DEFENDANTS' Plaintiffs, MOTION TO SET ASIDE ENTRY OF 12 **DEFAULT** 13 SPECTRUM PAINTING & DECORATING, Date: May 30, 2014 INC., a California corporation, aka Time: 10:00 a.m. Dept.: 1, 17th Floor, San Francisco, CA SPECTRUM PAINTING; and DAVID MIN 14 Judge: The Honorable Samuel Conti HANG CHAN, individually, 15 Defendants. **16** 17 18 PLEASE TAKE NOTICE that Plaintiffs BAY AREA PAINTERS AND TAPERS 19 PENSION TRUST FUND, et al. ("Plaintiffs") and Defendants SPECTRUM PAINTING & 20 DECORATING, INC., a California corporation, aka SPECTRUM PAINTING; and DAVID MIN 21 HANG CHAN, individually (collectively "Defendants"), have been working toward and are near 22 reaching an informal resolution of this matter, and therefore stipulate to continue the hearing on 23 Defendants' Motion to Set Aside Entry of Default, currently scheduled on May 30, 2014, for 24 approximately twenty (20) days to June 20, 2014, or as soon thereafter as the parties may be heard, 25 before the Honorable Samuel Conti, in Courtroom 1, 17th Floor, Federal Courthouse, 450 Golden **26** Gate Avenue, San Francisco, California 94102. 27 /// 28

STIPULATION RE DEFENDANTS' MOTION TO SET ASIDE ENTRY OF DEFAULT

No.: C13-1782 SC

1	Plaintiffs reserve their right to file an opposition to Defendants' Motion to Set Aside Entry	
2	of Default. The deadlines to file any opposition or reply papers shall be based on the new hearing	
3	date, with any opposition due fourteen (14) calendar days prior to the hearing and any reply due	
4	seven (7) calendar days prior to the hearing.	
5		
6	Dated: May, 2014	SALTZMAN & JOHNSON LAW CORPORATION
7		LAW CORI ORATION
8	By:	Erica J. Russell
9		Attorneys for Plaintiffs
10	Dated: May, 2014	SPECTRUM PAINTING & DECORATING,
11	Dated. 1/1dy	INC., a California corporation, aka SPECTRUM PAINTING
12		SI LCIRCIAITAIN (III (C
13	By:	David Chan
14		RMO/CEO/President of Defendant
15	Dated: May , 2014	DAVID MIN HANG CHAN, an individual
16	Dated. May , 2014	DAVID WIIN HANG CHAN, ali lildividual
17	By:	David Chan, individually
18		Defendant
19		STATES DISTRICT CO.
20	IT IS SO ORDERED.	
21		
22	Date: 05/12/2014	STATE OF THE STATE
23		Judge Samuel Conti
24		Judge Samus
25		
26		FERN DISTRICT OF CT
27		