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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL )	Case No. CV 13 3078
UNION NATIONAL INUDSTRY PENSION )	
FUND; STEPHEN ABRECHT, Trustee; )	STIPULATION AND [PROPOSED]
RODERICK S. BASHIR, Trustee; KEVIN J. )	ORDER GRANTING CONTINUANCE OF
DOYLE, Trustee; DAVID A. STILWELL, )	CASE MANAGEMENT CONFERENCE
Trustee; STEVEN W. FORD, Trustee; )	
LARRY T. SMITH, Trustee; FRANK A. )	
MASON, Trustee; EDWARD MANKO, )	
Trustee; JOHN J. SHERIDAN, Trustee; JOHN )	
J. SHERIDAN, Trustee; and MYRIAM )	
ESCAMILLA, Trustee, )	
Plaintiffs, )	
v. )	
GCA SERVICES GROUP, INC., a Delaware )	
corporation; and ACME BUILDING )	
MAINTENANCE CO., INC., a California )	
corporation, )	
Defendants. )	

**STIPULATION**

It is hereby stipulated and agreed by and between Plaintiffs SERVICE EMPLOYEES INTERNATIONAL UNION NATIONAL INUDSTRY PENSION FUND (the "Plaintiff Pension Fund"), and STEPHEN ABRECHT, Trustee; RODERICK S. BASHIR, Trustee; KEVIN J.

Stipulation and [Proposed] Order Granting Continuance of Case Management Conference

1 DOYLE, Trustee; DAVID A. STILWELL, Trustee; STEVEN W. FORD, Trustee; LARRY T.  
2 SMITH, Trustee; FRANK A. MASON, Trustee; EDWARD MANKO, Trustee; JOHN J.  
3 SHERIDAN, Trustee; JOHN J. SHERIDAN, Trustee; and MYRIAM ESCAMILLA, Trustee  
4 (the "Plaintiff Trustees"), and Defendants GCA SERVICES GROUP, INC., ("GCA"), ACME  
5 BUILDING MAINTENANCE CO., INC., ("ACME"), (hereinafter collectively referred to as the  
6 "Parties"), by and through their respective attorneys of record, as follows:

7 WHEREAS the Parties met and conferred via telephone on September 18 and 20, 2013,  
8 as part of their obligations under Federal Rule of Civil Procedure R.26, regarding the matters at  
9 issue and discovery to be conducted;

10 WHEREAS the Parties agreed after such telephone conferences there is a potential for  
11 early resolution of the instant matter after limited informal discovery, particularly GCA and  
12 ACME obtaining and producing their 2006-2008 California Employment and Development  
13 Department ("EDD") Quarterly Wage and Withholding Reports ("DE-6 forms") to Plaintiffs;

14 WHEREAS the Parties have not previously requested a time modification in this case;

15 WHEREAS the Parties submit that good cause exists for this brief continuance in that a  
16 continuance will minimize attorneys' fees and costs and court resources in the interim as the  
17 Parties attempt to resolve the instant matter;


18 NOW THEREFORE, it is hereby stipulated that the parties jointly request that this Court  
19 issue an Order Continuing the Case Management Conference currently scheduled for October 3,  
20 2013 at 10:00 a.m. in Courtroom B, pursuant to this Court's July 3, 2013 scheduling order, to  
21 November 14, 2013 or any date thereafter as the court sees fit.

22 **IT IS SO STIPULATED.**

23 Dated: September 23, 2013

SALTZMAN & JOHNSON LAW CORP.

24 By:

  
25 Kimberly Anne Hancock  
26 Attorneys for Plaintiffs SERVICE  
27 EMPLOYEES INTERNATIONAL  
28 UNION NATIONAL INDUSTRY  
PENSION FUND, et al

Stipulation and [Proposed] Order Granting Continuance of Case Management Conference

1 Dated: September 21, 2013

HAIGHT BROWN & BONESTEEL LLP

2  
3  
4 By:



5 Steven M. Cvitanovic  
6 Jessica M. Lassere  
7 Attorneys for Defendants GCA  
8 SERVICES GROUP, INC., a Delaware  
9 corporation; and ACME BUILDING  
10 MAINTENANCE CO., INC., a  
11 California corporation

12 **PROPOSED ORDER**

13 After consideration of the above Stipulation, and for good cause shown, it is hereby  
14 ORDERED, ADJUDGED AND DECREED:

15 That the parties requested continuance is granted and the initial Case Management  
16 Conference hearing date be continued from October 3, 2013 to November 14, 2013. It is  
17 furthermore ordered that all related Rule 16 and Rule 26 deadlines are likewise continued in  
18 accordance with the new hearing date.

19  
20 Dated: September 24, 2013

21 Judge Maria-Elena James  
22 Northern District of California

