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11 Attorneys for Defendants GCA SERVICES
 12 GROUP, INC., a Delaware corporation;
 and ACME BUILDING MAINTENANCE CO.,
 13 INC., a California corporation

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 SERVICE EMPLOYEES INTERNATIONAL
 UNION NATIONAL INUDSTRY PENSION
 17 FUND; STEPHEN ABRECHT, Trustee;
 RODERICK S. BASHIR, Trustee; KEVIN J.
 18 DOYLE, Trustee; DAVID A. STILWELL,
 Trustee; STEVEN W. FORD, Trustee;
 19 LARRY T. SMITH, Trustee; FRANK A.
 MASON, Trustee; EDWARD MANKO,
 20 Trustee; JOHN J. SHERIDAN, Trustee; JOHN
 J. SHERIDAN, Trustee; and MYRIAM
 21 ESCAMILLA, Trustee,

22 Plaintiffs,

23 v.

24 GCA SERVICES GROUP, INC., a Delaware
 corporation; and ACME BUILDING
 25 MAINTENANCE CO., INC., a California
 corporation,

26 Defendants.
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CASE NO. CV 13 03078 MEJ
JOINT CASE MANAGEMENT
CONFERENCE STATEMENT;
STIPULATION AND JOINT REQUEST
TO EXTEND DATE FOR COMPLETION
OF MEDIATION; [PROPOSED] ORDER
THEREON

Date: March 12, 2015
 Time: 10:00 a.m.
 Judge: Hon. Maria-Elena James
 Courtroom: B, Fifteenth Floor
 450 Golden Gate Avenue
 San Francisco, CA

Complaint filed: July 3, 2013

1 Pursuant to Rule 16-10(d) of the Local Rules of this Court, Plaintiffs Service Employees
2 International Union National Industry Pension Fund (the "Fund") and its Trustees jointly with
3 Defendants GCA Services Group, Inc. ("GCA"), and Acme Building Maintenance Co., Inc.
4 ("Acme") (collectively "Defendants), submit this updated Joint Case Management Conference
5 Statement and Stipulation to Continue Case Management Conference set for March 12, 2015.

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7 1. Progress or changes since last Case Management Statement

8 A. Audit Completed

9 The Fund has completed its payroll audit of defendants. Based on audit findings, the amount
10 of plaintiffs' claim as of February 28, 2015 is as follows:

\$296,108.97	Unpaid contributions from audit, including surcharges (§ 502(g)(2)(A))
\$169,407.22	Interest on unpaid contributions-audit (§ 502(g)(2)(B))
\$169,407.22	Amount equal to interest-audit (§ 502(g)(2)(C))
\$33,850.89	Reasonable attorney's fees as of February 28, 2015 (§ 502(g)(2)(D))
\$744.39	Costs of suit (§ 502(g)(2)(D))
\$4,116.00	Testing Fee (§ 502(g)(2)(E), <i>Operating Engineers Pension Trust v. A-C Co.</i> , 859 F.2d 1336, 1343 (9th Cir. 1988))
\$673,634.69	Total audit claim as of February 28, 2015

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16 In January 2015, defendants provided plaintiffs with a preliminary response to its audit
17 results. Defendants contend that the vast majority of plaintiffs' damages are barred by the four-year
18 statute of limitations. Following mediation in January, Defendants are in the process of conducting a
19 joint review with plaintiffs' representatives of the amount of purportedly unpaid contributions found
20 in the audit, and anticipate challenging any amounts that they contend were found in error. The
21 parties anticipate that defendants will provide plaintiffs with a detailed response to the audit, with
22 supporting documentation. Plaintiffs anticipate that they may revise the audit if Defendants present
23 meritorious and documented challenges as to any of the contributions found due.

24 B. ADR

25 The parties participated in a mediation session on January 28, 2015. As reported by the
26 mediator (Docket No. 41), the mediation process is continuing, with a further mediation session
27 scheduled for May 7, 2015.

1 2. Proposals for case development process.

2 The parties continue to anticipate that this matter will be resolved through the mediation
3 process. The parties propose that a Case Management Conference be set for a date shortly after May
4 7, 2015, the date of the scheduled mediation session, to report to the Court on the status of the
5 matter and to set a trial date should the mediation be unsuccessful.

6 3. Joint request to extend date to complete mediation to May 7, 2015.

7 The parties hereby stipulate and jointly request that the Court extend the date to complete
8 mediation to May 7, 2015.

9 Dated: March 5, 2015

SALTZMAN & JOHNSON LAW CORPORATION

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_____ /S/ _____

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By: Anne M. Bevington
Attorneys for Plaintiffs

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14 Dated: March 5, 2015

HAIGHT BROWN & BONESTEEL LLP

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By: Jessica M. Lassere Ryland
Attorneys for Defendants

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DECLARATION OF ANNE M. BEVINGTON

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Pursuant to ECF General Order 45, I, Anne M. Bevington, declare as follows:

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1. The signatory listed above, Jessica M. Lassere Ryland, of the law firm of Haight
Brown & Bonesteel LLP, is an attorney of record for Defendants GCA Services Group, Inc., a
Delaware corporation; and Acme Building Maintenance Co., Inc., a California corporation;

2. Concurrent with the e-filing of the within Joint Case Management Conference
Statement, authority was obtained from Jessica M. Lassere Ryland in lieu of her signature on the
Stipulation;

1 3. The Law Offices of Saltzman & Johnson maintain a record to support this
2 concurrence for subsequent production for this court if so ordered for inspection upon request by a
3 party until one year after final resolution of the within action, including appeal, if any.

4 I declare under penalty of perjury that the foregoing is true and correct and that this
5 declaration was signed this 5th day of March, 2015, at San Francisco, California.

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Anne M. Bevington

ORDER

Based on the foregoing Joint Case Management Statement and Stipulation and Joint Request to Extend Date for Completion of Mediation, and good cause appearing, it is hereby ordered that the parties shall complete the Mediation on or before May 7, 2015 and a Case Management Conference shall be held on May 28, 2015, at 10:00 a.m. with Joint CMC statement due May 21.

IT IS SO ORDERED.

Dated: March 6, 2015



HONORABLE MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

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