

1 Carmen Plaza de Jennings (SBN 091742)
 Jayne Benz Chipman (SBN 140048)
 2 HIRSCHFELD KRAEMER LLP
 505 Montgomery Street, 13th Floor
 3 San Francisco, CA 94111
 Telephone: (415) 835-9000
 4 Facsimile: (415) 834-0443
 E-mail: cpdjennings@hkemploymentlaw.com
 5 jchipman@hkemploymentlaw.com

6 Benjamin K. Lunch (SBN 246015)
 Wan Yan Ling (SBN 297029)
 7 NEYHART, ANDERSON, FLYNN & GROSBOLL
 369 Pine Street, Suite 800
 8 San Francisco, CA 94104
 Telephone: (415) 677-9440
 9 Facsimile: (415) 677-9445
 E-mail: blunch@neyhartlaw.com
 10 wling@neyhartlaw.com

11 **Attorneys for Defendants & Plaintiffs**

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT
 14 SAN FRANCISCO DIVISION

HIRSCHFELD KRAEMER LLP
 ATTORNEYS AT LAW
 SAN FRANCISCO

16 ELECTRICAL INDUSTRY SERVICE
 BUREAU, INC.; NORTHERN
 17 CALIFORNIA ELECTRICAL
 WORKERS PENSION TRUST; et al.,

18 Plaintiffs,

19 vs.

20 BEING OF SERVICE, INC., a California
 21 corporation; ADVANCED ELECTRIC
 SOLUTIONS, INC., a California
 22 corporation,

23 Defendants.

Case No. 3:13-cv-05810-WHO

STIPULATION RE: EXTENSION OF DISCOVERY & ~~PROPOSED~~ ORDER

Mediator: C. Mark Humbert
 Complaint Filed: December 16, 2013
 Trial Date: October 13, 2015

24 //
 25 //
 26 //
 27 //
 28 //

1 The parties to the above-action hereby submit the following Stipulation regarding the
2 Order issued on January 13, 2015 by the Hon. William H. Orrick.

3 WHEREAS, the parties have engaged in meaningful mediation and settlement efforts with
4 the parties' selected Mediator, C. Mark Humbert; and

5 WHEREAS, the parties believe that continuation of the discovery and other court dates is
6 necessary to facilitate completion of the ongoing mediation process;

7 In light of the foregoing, Plaintiffs ELECTRICAL INDUSTRY SERVICE BUREAU,
8 INC. and NORTHERN CALIFORNIA ELECTRICAL WORKERS PENSION TRUST, et al. and
9 Defendants BEING OF SERVICE, INC., a California Corporation and ADVANCED ELECTRIC
10 SOLUTIONS, INC., a California Corporation, by their undersigned counsel, do hereby stipulate
11 to an order continuing the dates for the pre-trial schedule by sixty (60) days:

12	Matter	Date as scheduled	Date continued to
13			
14	Discovery cutoff:	May 27, 2015	July 27, 2015
15	Expert disclosure:	April 8, 2015	June 8, 2015
16	Motions heard by:	July 7, 2015	September 8, 2015
17			


18 Both parties believe this continuance is in the best interest of all parties in resolving the
19 case.

20 IT IS SO STIPULATED.

21
22 Dated: April 8, 2015

Respectfully submitted,

HIRSCHFELD KRAEMER LLP


23 
24 Carmen Plaza de Jennings
25 Jayne Benz Chipman
26 Attorneys for Defendants
27
28

HIRSCHFELD KRAEMER LLP
ATTORNEYS AT LAW
SAN FRANCISCO

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: April 8, 2015

NEYHART, ANDERSON, FLYNN &
GROSBOLL


Benjamin K. Lunch
Wan Yan Ling
Attorneys for Plaintiffs

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the Case Management Conference, currently set for
May 12, 2015 at 2:00 p.m. in the above action is hereby continued to August 11, 2015, in
Dept. 2 of the U.S. District Court, Northern District of California, San Francisco Division.

~~IT IS FURTHER ORDERED that the Pretrial Conference, currently set for September 14,~~
~~2015 at 2:00 p.m. in the above action is hereby continued to _____, in Dept~~
~~_____ of the U.S. District Court, Northern District of California, San Francisco Division.~~

~~IT IS FURTHER ORDERED that the trial date, currently set for October 13, 2015 at 8:30~~
~~a.m. in the above action is hereby continued to _____, in Dept _____ of the~~
~~U. S. District Court, Northern District of California, San Francisco Division.~~

Dated: April 20, 2015


Hon. William H. Orrick