

1 Michele R. Stafford, Esq. (SBN 172509)
Erica J. Russell, Esq. (SBN 274494)
2 SALTZMAN & JOHNSON LAW CORPORATION
44 Montgomery Street, Suite 2110
3 San Francisco, CA 94104
Telephone: (415) 882-7900
4 Facsimile: (415) 882-9287
mstafford@sjlawcorp.com
5 erussell@sjlawcorp.com

6 Attorneys for Plaintiffs

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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 RUSSELL E. BURNS, et al.,

12 Plaintiffs,

13 v.

14 B & B Sweeping, a California Limited Liability
Company; Brett Herring, an individual,

15 Defendants.
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Case No.: C14-1798 VC

**PLAINTIFFS' REQUEST TO CONTINUE
CASE MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER THEREON**

Date: September 23, 2014
Time: 10:00 a.m.
Location: 450 Golden Gate Avenue
San Francisco, CA 94102
Courtroom 4, 17th Floor
Judge: Honorable Vince Chhabria

18 Plaintiffs respectfully request that the Case Management Conference, currently on calendar
19 for September 23, 2014, be continued for approximately forty-five (45) days. Good cause exists
20 for the granting of the continuance, as follows:

21 1. As the Court's records will reflect, this action was filed on April 18, 2014. The
22 Defendants were served on April 24, 2014, and Proofs of Service of Summons were filed with the
23 Court on May 2, 2014 (Dkt. #11 and #12). Defendants failed to plead or otherwise respond to the
24 lawsuit, and the Clerk entered default as to Defendants on June 25, 2014 (Dkt. #15). Defendants
25 were duly served with a copy of the Clerk's Notice of Default Entry, and a Proof of Service of
26 same was filed with the Court on June 26, 2014 (Dkt. #16).

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2. While Plaintiffs anticipated filing a Motion for Default Judgment by mid-August, the parties were communicating and Plaintiffs attempted to reach an informal resolution with Defendants by again offering Defendants the opportunity to enter into a payment plan for the amounts owed to Plaintiffs. However, Defendants failed to enter into a payment plan, therefore Plaintiffs continued their preparation of and are finalizing a Motion for Default Judgment. Plaintiffs will file the Motion for Default Judgment within seven (7) days from today's date.

3. There are no issues that need to be addressed by the parties at the currently scheduled Case Management Conference. In the interest of conserving costs as well as the Court's time and resources, Plaintiffs respectfully request that the Court continue the currently scheduled Case Management Conference for approximately 45 days to coincide with the hearing date of the Motion for Default Judgment.

I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled action, and that the foregoing is true of my own knowledge.

Executed this 16th day of September 2014, at San Francisco, California.

**SALTZMAN & JOHNSON
LAW CORPORATION**

By: _____ /S/
Erica J. Russell
Attorneys for Plaintiffs

IT IS SO ORDERED.

The currently set Case Management Conference is hereby continued to November 4, 2014 at 10:00 a.m., and all previously set deadlines and dates related to this case are continued accordingly.

Date: September 18, 2014

UNITED STATES DISTRICT COURT JUDGE