

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

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

BAY AREA PAINTERS AND TAPERS  
 PENSION TRUST FUND, et al.,

Plaintiffs,

v.

DI GIROLAMO PAINTING AND  
 DECORATING, INC.,

DEFENDANT.

Case No.: C14-02362-TEH

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

Date: September 8, 2014

Time: 1:30 p.m.

Dept.: Courtroom 12, 19th Floor, San  
 Francisco, CA

Judge: Honorable Thelton E. Henderson

Plaintiffs herein respectfully request that the Case Management Conference, currently on calendar for September 8, 2014, be continued for approximately sixty (60) days. Good cause exists for the continuance, as follows:

1. As the Court's records will reflect, this action was filed on May 21, 2014 to collect unpaid contributions and related amounts owed to Plaintiffs for work performed by Defendants' employees, pursuant to the Collective Bargaining Agreement.
2. Plaintiffs had difficulties locating Defendant to effectuate service. After numerous attempts, Defendant was served with the Complaint on August 15, 2014 and a Proof of Service of Summons was filed with the Court on August 22, 2014.
3. Defendant's Responsive Pleading deadline is September 5, 2014.

-1-  
**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE**  
 Case No.: C14-02362-TEH

4. 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 sixty (60) days to allow sufficient time for the Defendant to respond to Plaintiffs' Complaint and for the parties to attempt to resolve the matter informally.

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 28<sup>th</sup> day of August, 2014, at San Francisco, California.

SALTZMAN & JOHNSON  
LAW CORPORATION

By: /s/  
Erica J. Russell  
Attorneys for Plaintiffs

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to 11/17/2014, at 1:30 PM. All related deadlines are extended accordingly.

Date: 09/02/2014

