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6	Attorneys for Plaintiffs		
7	UNITED STATES DISTRICT COURT		
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
9			
10	BAY AREA PAINTERS AND TAPERS PENSION TRUST FUND, et al.,	Case No.: C14-0336	4 - HSG
11	Plaintiffs,	REQUEST FOR EXTENSION OF TIME TO FILE PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT; ORDER THEREON	
12	v.		
13	VENTURA FINISHING SYSTEMS, a	Current Deadline:	April 1, 2015
14	California Corporation,	Proposed Deadline: Judge:	
15	Defendant.	Judge: Courtroom:	15 – 18 th Floor
16			
17	TO THE COURT:		
18	Plaintiffs Bay Area Painters and Tapers Pension Trust Fund, et al. ("Plaintiffs"), by and		
19	through their counsel, hereby respectfully request a two-week extension of time by which to file		
20	Plaintiffs' Motion for Default Judgment. GOOD CAUSE exists to grant the extension for the		
21	following reasons:		
22	1. As the Court records reflect, this matter came on for hearing for a scheduled Case		
23	Management Conference before the Honorable Haywood S. Gilliam on March 18, 2015 in the		
24	above-captioned Court. [Dkt. No. 38]. Adrian L. Canzoneri, Esq. appeared on behalf of Plaintiffs.		
25	Justine Kastan, Esq., former counsel for Defendant, also appeared. There was no appearance by		
26	Defendant.		
27	2. At the March 18, 2015 Case Management Conference, the Court ordered Plaintiffs		
28	to file their Motion for Default Judgment by April 1, 2015. [Id.].		

PLAINTIFFS' REQUEST FOR EXTENSION OF TIME TO FILE MOTION FOR DEFAULT JUDGMENT

Case No.: C14-03364-HSG

- 3. However, on Monday, March 23, 2015, presumably after being advised by its former counsel, Defendant contacted Plaintiffs' counsel to discuss the amounts owed to Plaintiffs, in addition to the documents needed by Plaintiffs to complete the audit of Defendant's payroll records. Defendant indicated his willingness to attempt to resolve this matter without the need for further litigation. Plaintiffs' counsel requested that Defendant submit the necessary additional documents as soon as possible so that the complete and final amounts owed to Plaintiffs could be ascertained. Accordingly, Plaintiffs are requesting the two-week extension herein.
- 4. Upon review of the Honorable Judge Gilliam's law and motion calendar and scheduling notes, the first available hearing date for Plaintiffs' Motion for Default Judgment is June 4, 2015. Thus, neither the Court nor the parties to this matter will be significantly affected by the requested two-week extension.
- 5. As the parties are now currently engaged in discussions in an attempt to resolve this matter without the need for further litigation, in the interest of judicial economy and efficiency, as well as the preservation of the Court's time and resources, Plaintiffs' respectfully request that the deadline to file the Motion for Default Judgment, currently set for April 1, 2015, be extended two weeks, up to and including **April 15, 2015**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true of my own knowledge and if called upon I could and would testify competently thereto.

Executed this 25th day of March 2015, at San Francisco, California.

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the deadline for Plaintiffs to file their Motion for Default Judgment shall be extended by a period of two weeks, up to and including April 15, 2015.

Date: 3/26/2015

HONORABLE HAYWOOD S. GILLIAM, JR. UNITED STATES MAGISTRATE JUDGE

Adrian L. Canzoneri

PROOF OF SERVICE

I, the undersigned, declare:

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- 1. I am a citizen of the United States and am employed in the County of San Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.
 - 2. I am over the age of eighteen and not a party to this action.
 - 3. On **March 25, 2015**, I served the following document(s):

PLAINTIFFS' REQUEST FOR EXTENSION OF TIME TO FILE MOTION FOR DEFAULT JUDGMENT; [PROPOSED] ORDER THEREON

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and placing the envelope for collection and First Class mailing following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelopes were addressed and mailed as follows:

Ventura Finishing Systems 45278 Industrial Drive. Fremont, CA 94538

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **March 25**, **2015**, at San Francisco, California.

/S/ Alicia Rutkowski Paralegal

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