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7
 8 UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 BAY AREA PAINTERS AND TAPERS
 PENSION TRUST FUND, et al.,
 11 Plaintiffs,
 12 v.
 13 VENTURA FINISHING SYSTEMS, a
 14 California Corporation,
 15 Defendant.

Case No.: C14-03364 - HSG

**REQUEST FOR EXTENSION OF TIME
 TO FILE PLAINTIFFS' MOTION FOR
 DEFAULT JUDGMENT; ORDER
 THEREON**

Current Deadline: April 1, 2015
 Proposed Deadline: April 15, 2015
 Judge: Hon. Haywood S. Gilliam
 Courtroom: 15 – 18th Floor

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.*].

1 **PROOF OF SERVICE**

2 I, the undersigned, declare:

3 1. I am a citizen of the United States and am employed in the County of San
4 Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San
5 Francisco, California 94104.

6 2. I am over the age of eighteen and not a party to this action.

7 3. On **March 25, 2015**, I served the following document(s):

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

10
11 on the interested parties in said action by enclosing a true and exact copy of each document
12 in a sealed envelope and placing the envelope for collection and First Class mailing following our
13 ordinary business practices. I am readily familiar with this business' practice for collecting and
14 processing correspondence for mailing. On the same day that correspondence is placed for
15 collection and mailing, it is deposited in the ordinary course of business with the United States
16 Postal Service in a sealed envelope with postage fully prepaid.

17 4. The envelopes were addressed and mailed as follows:

18 **Ventura Finishing Systems**
19 **45278 Industrial Drive.**
20 **Fremont, CA 94538**

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

23 _____ /S/
24 Alicia Rutkowski
25 Paralegal
26
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