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 8 VENTURA FINISHING
 SYSTEMS, INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

14 BAY AREA PAINTERS AND TAPERS
 PENSION TRUST FUND, et al.,
 15
 Plaintiff,
 16
 v.
 17
 VENTURA FINISHING SYSTEMS, a
 18 California Corporation,
 19
 Defendant.

Case No. C14-03364 HSG

**STIPULATION AND ORDER TO
 RESCHEDULE HEARING ON MOTION
 FOR DEFAULT JUDGMENT AND TO SET
 BRIEFING SCHEDULE**

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STIPULATION

The parties stipulate to the following.

Plaintiffs filed the Complaint in this action on July 24, 2014. Defendant answered the Complaint on August 29, 2014.

On December 1, 2014, the Court (Hon. J. White) granted Defendant’s former counsel’s motion to withdraw and ordered Defendant to file a substitution of counsel form by February 13, 2015. On June 11, 2015, Plaintiffs filed a Motion for Default Judgment (“Motion”), pursuant to an order by this Court to do so because Defendant had not filed a substitution of counsel by February 13, 2015. The initial deadline to file the Motion by April 1, 2015, was extended to April 15, 2015, and then extended to June 11, 2015. The Motion is set for hearing on August 13, 2015.

Defendant retained new counsel to advise it regarding this action in approximately March 2015 and that counsel filed a Notice of Appearance on June 25, 2015. Defendant, if necessary, will oppose the Motion.

The parties have agreed that it would be helpful to their efforts to exchange information and to have productive discussions about resolving this matter if they could focus their time and attention to those efforts over approximately the next month, instead of on further briefing of the Motion. The parties also wish to avoid unnecessarily asking this Court to review briefing on the Motion and to hear argument on the Motion.

The parties therefore request that this Court reschedule the hearing on the Motion to September 17, 2015, or to the next soonest date that is convenient to the Court. The parties also request that this Court set August 3, 2015, as the due date for any opposition to the Motion and set August 17, 2015, as the due date for any reply in support of the Motion.

Dated: June 26, 2015

DONAHUE FITZGERALD LLP

By: /s/ D. Anthony Rodriguez

D. Anthony Rodriguez
Attorneys for Defendant
VENTURA FINISHING SYSTEMS, INC.

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Dated: June 26, 2015

SALTZMAN & JOHNSON LAW CORPORATION

By: signed by D. Anthony Rodriguez w/permission
Adrian L. Canzoneri
Attorneys for Plaintiffs
BAY AREA PAINTERS AND TAPERS
PENSION TRUST FUND, et al.

Attestation Regarding Signature: This document is being filed electronically under my ECF User ID and Password. Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in this filing of this document has been obtained from the signatories to this document.

/s/ D. Anthony Rodriguez
D. Anthony Rodriguez


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ORDER

On Stipulation of the parties, dated June 26, 2015, and for good cause shown, the Court orders the following:

- (1) Plaintiffs' June 11, 2015, Motion for Default Judgment, set for hearing on August 13, 2015, is rescheduled to be heard on September 24, 2015;
- (2) Defendant shall file any opposition to the Motion for Default Judgment on or before August 3, 2015;
- (3) Plaintiffs shall file any reply in support of the Motion for Default Judgment on or before August 17, 2015.

Dated: June 30, 2015



HON. HAYWOOD S. GILLIAM, JR.
JUDGE, UNITED STATES DISTRICT COURT