

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, California 94104
 Telephone: (415) 882-7900
 4 Facsimile: (415) 882-9287
 Email: mstafford@sjlawcorp.com
 5 Email: erussell@sjlawcorp.com

6 Attorneys for Plaintiffs Bay Area Painters
 and Tapers Pension Trust Fund, et al.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

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

Case No. C14-03364 HSG

12 Plaintiffs,

**JUDGMENT PURSUANT TO
 STIPULATION**

13 v.

14 VENTURA FINISHING SYSTEMS, a California
 Corporation;

15 Defendants.

17
 18 IT IS HEREBY STIPULATED and AGREED (the “Stipulation”) by and between the parties
 19 hereto, that Judgment shall be entered in the within action in favor of Plaintiffs Bay Area Painters and
 20 Tapers Pension Trust Fund, et al. (“Plaintiffs” or “Trust Funds”) and against Defendant Ventura
 21 Finishing Systems, a California Corporation as follows:

22 1. Defendants are currently indebted to the Trust Funds as follows:

REVISED AUDIT (8/1/10 – 9/30/14)		
Contribution Underpayments	\$111,710.84	
20% Liquidated Damages	\$22,342.17	
5% Interest (through 1/31/15)	\$12,180.01	
Additional 5% Interest (1/31/15-7/7/16)	\$8,017.20	
Inspection Costs:	\$8,494.00	
Subtotal:		\$162,744.22

CONTRIBUTIONS & RELATED AMOUNTS		
Unpaid 1/12 Contributions	\$542.80	
10% Liquidated Damages on Unpaid 1/12 Contributions (min. assessment)	\$150.00	
5% Interest on Unpaid 1/12 Contributions (through 7/7/16)	\$118.23	
Unpaid 4/12 Contributions	\$949.90	
10% Liquidated Damages on Unpaid 4/12 Contributions (max. assessment)	\$750.00	
5% Interest on Unpaid 4/12 Contributions (through 7/7/16)	\$718.21	
Unpaid 5/12 Contributions	\$542.80	
10% Liquidated Damages on Unpaid 5/12 Contributions (max. assessment)	\$750.00	
5% Interest on Unpaid 5/12 Contributions (through 7/7/16)	\$384.74	
Unpaid 5/13 Contributions	\$5,634.48	
20% Liquidated Damages on Unpaid 5/13 Contributions	\$1,126.90	
5% Interest on Unpaid 5/13 Contributions (through 7/7/16)	\$851.35	
Unpaid 6/13 Contributions	\$3,922.04	
20% Liquidated Damages on Unpaid 6/13 Contributions	\$784.41	
5% Interest on Unpaid 6/13 Contributions (through 7/7/16)	\$575.95	
Unpaid 7/13 Contributions	\$14,390.02	
20% Liquidated Damages on Unpaid 7/13 Contributions	\$2,878.00	
5% Interest on Unpaid 7/13 Contributions (through 7/7/16)	\$2,054.03	
Unpaid 8/13 Contributions	\$11,945.80	
20% Liquidated Damages on Unpaid 8/13 Contributions	\$2,389.16	
5% Interest on Unpaid 8/13 Contributions (through 7/7/16)	\$1,654.41	
Unpaid 9/13 Contributions	\$9,501.28	
20% Liquidated Damages on Unpaid 9/13 Contributions	\$1,900.26	
5% Interest on Unpaid 9/13 Contributions (through 7/7/16)	\$1,275.51	
Unpaid 10/13 Contributions	\$5,800.20	
20% Liquidated Damages on Unpaid 10/13 Contributions	\$1,160.04	
5% Interest on Unpaid 10/13 Contributions (through 7/7/16)	754.82	
Unpaid 11/13 Contributions	\$2,886.34	
20% Liquidated Damages on Unpaid 11/13 Contributions	\$577.27	
5% Interest on Unpaid 11/13 Contributions (through 7/7/16)	\$363.36	
Unpaid 12/13 Contributions	\$2,209.60	
20% Liquidated Damages on Unpaid 12/13 Contributions	\$441.92	
5% Interest on Unpaid 12/13 Contributions (through 7/7/16)	\$268.78	
Unpaid 1/14 Contributions	\$2,697.60	
20% Liquidated Damages on Unpaid 1/14 Contributions	\$539.52	
5% Interest on Unpaid 1/14 Contributions (through 7/7/16)	\$317.80	

	Unpaid 2/14 Contributions	\$2,023.20
	20% Liquidated Damages on Unpaid 2/14 Contributions	\$404.64
	5% Interest on Unpaid 2/14 Contributions (through 7/7/16)	\$229.76
	Unpaid 7/14 Contributions	\$5,736.95
	20% Liquidated Damages on Unpaid 7/14 Contributions	\$1,147.39
	5% Interest on Unpaid 7/14 Contributions (through 7/7/16)	\$532.04
	Unpaid 8/14 Contributions	\$6,859.14
	20% Liquidated Damages on Unpaid 8/14 Contributions	\$1,371.83
	5% Interest on Unpaid 8/14 Contributions (through 7/7/16)	\$606.99
	Unpaid 9/14 Contributions	\$3,006.70
	20% Liquidated Damages on Unpaid 9/14 Contributions	\$601.34
	5% Interest on Unpaid 9/14 Contributions (through 7/7/16)	\$253.30
	Unpaid 10/14 Contributions	\$2,725.70
	20% Liquidated Damages on Unpaid 10/14 Contributions	\$545.14
	5% Interest on Unpaid 10/14 Contributions (through 7/7/16)	\$218.43
	Subtotal:	\$110,070.08
	Attorneys' Fees (12/3/13 – 7/6/16)	\$34,471.00
	Costs (12/3/13 – 7/6/16)	\$978.78
	Subtotal:	\$35,449.78
	TOTAL DUE:¹	\$308,264.08

2. Judgment shall be entered for the total due of \$308,264.08.

3. Enforcement of Judgment shall be stayed for 45 days from the date that this Judgment is executed by the parties.

4. Defendant shall provide Plaintiffs with reasonably available and relevant financial documentation to allow Plaintiffs to evaluate Defendant's ability to pay the amounts due. Plaintiffs shall provide Defendants with a list of all requested documents, which shall be provided by Defendant to Plaintiffs, if they so exist and/or are available, within ten (10) business days of Defendant receiving said list.

5. The parties agree that the Court shall retain jurisdiction of this matter until this Judgment

¹ Defendant has failed to submit its contribution reports for August 2015 through May 2016. Any amounts found to be due for this period, including any liquidated damages and interest, based on contribution reports, time cards, audit, estimates pursuant to Plaintiffs' Collection Procedures, or otherwise, shall be added to the Judgment total.

1 is satisfied.

2 DATED: July 12, 2016

VENTURA FINISHING SYSTEMS, INC.

3 By: _____ /S/
4 Mohinder Pal Singh
5 for Defendant Ventura Finishing Systems, Inc.

6 DATED: July 12, 2016

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

7 By: _____ /S/
8 James Hewett
9 Trustee of Plaintiff Trust Funds

10 DATED: July 12, 2016

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

11 By: _____ /S/
12 Marian Bourboulis
13 Trustee of Plaintiff Trust Funds

APPROVED AS TO FORM.

14 DATED: July 12, 2016

**SALTZMAN & JOHNSON LAW
CORPORATION**

15 By: _____ /S/
16 Erica J. Russell, Esq.
17 Attorneys for Bay Area Painters and Tapers
18 Pension Trust Fund, et al.

19 DATED: July 12, 2016

GAURAV BOBBY KALRA

20 By: _____ /S/
21 Gaurav Bobby Kalra, Esq.
22 Attorney for Defendants Ventura Finishing
23 Systems, Inc.

24 IT IS SO ORDERED.

25 IT IS FURTHER ORDERED that the calendar in this matter is vacated, and that the Court shall
26 retain jurisdiction over this matter.

27 DATED: August 1, 2016

28 
UNITED STATES DISTRICT JUDGE