

1 Michele R. Stafford, Esq. (SBN 172509)
 Timothy A. Froehle, Esq. (SBN 265168)
 2 SALTZMAN & JOHNSON LAW CORPORATION
 44 Montgomery Street, Suite 2110
 3 San Francisco, CA 94104
 Telephone: (415) 882-7900
 4 Facsimile: (415) 882-9287
mstafford@sjlawcorp.com
tfroehle@sjlawcorp.com
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6 Attorneys for Plaintiffs

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

10 DISTRICT COUNCIL 16 NORTHERN
 11 CALIFORNIA HEALTH AND WELFARE
 TRUST FUND, et al.,

12 Plaintiffs,

13 v.

14 TECHNO COATINGS, INC., a California
 15 corporation,

16 Defendant.

Case No.: C15-03946 RS

**PLAINTIFFS' REQUEST TO VACATE,
 OR ALTERNATIVELY CONTINUE, CASE
 MANAGEMENT CONFERENCE; and
 [PROPOSED] ORDER THEREON**

Date: March 24, 2016
 Time: 10:00 a.m.
 Ctrm: 3, 17th Floor
 450 Golden Gate Ave.
 San Francisco, CA 94102
 Judge: The Honorable Richard Seeborg

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 18 Plaintiffs respectfully request that the Case Management Conference scheduled for March
 19 24, 2016, at 10:00 a.m., be vacated, or in the alternative continued to the date and time of the
 20 hearing on Plaintiffs' Motion for Default Judgment, filed concurrently herewith. Good cause to
 21 vacate the Case Management Conference exists as follows:

22 1. As the Court's records will reflect, this action was filed on August 28, 2015 (Dkt.
 23 #1). Defendant was personally served on September 15, 2015, and a Proof of Service of Summons
 24 was filed with the Court on October 1, 2015 (Dkt. #12).

25 2. Defendant failed to plead or otherwise respond to the lawsuit, and the Clerk entered
 26 default as to Defendant on November 27, 2015 (Dkt. #15).

27 3. As Defendant has failed and refused to comply with its obligations to Plaintiffs,
 28 Plaintiffs are filing their Motion for Default Judgment against Defendant concurrently with this

**PLAINTIFFS' REQUEST TO VACATE, OR ALTERNATIVELY CONTINUE, CASE MANAGEMENT
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1 Request to Vacate the Case Management Conference. Accordingly, there are no issues that need to
2 be addressed by this Court at the currently scheduled Case Management Conference. In the
3 interest of conserving costs as well as the Court's time and resources, Plaintiffs respectfully
4 request that the Court vacate the currently scheduled Case Management Conference, or in the
5 alternative continue the currently scheduled Case Management Conference to the date and time of
6 the hearing on Plaintiffs' Motion for Default Judgment.

7 4. Plaintiffs recognize that a case management conference statement is due seven days
8 in advance of the case management conference date and that the statement must include all
9 elements requested in the "Standing Order for All Judges of the Northern District of California –
10 Contents of Joint Case Management Statement" pursuant to Local Rule 16-9. Should this Court
11 require Plaintiffs to file a Case Management Conference Statement, Plaintiffs will do so promptly.

12
13 Dated: March 16, 2016


**SALTZMAN & JOHNSON
LAW CORPORATION**

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15 By: _____ /S/
16 Michele R. Stafford
Attorneys for Plaintiffs

17 IT IS SO ORDERED.

18 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case
19 Management Conference is hereby ~~VACATED, or in the alternative,~~ CONTINUED to
20 6/9/16 at 10:00 a.m.

21 Date: 3/17/16


22 THE HONORABLE RICHARD SEEBORG
23 UNITED STATES DISTRICT COURT JUDGE

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28 PROOF OF SERVICE