

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, District Council 16
 Northern California Health and Welfare
 7 Trust Fund, et al.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

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

Case No. C15-5209 LB

**PLAINTIFFS' REQUEST TO CONTINUE
 CASE MANAGEMENT CONFERENCE;
 13 ~~PROPOSED~~ ORDER THEREON**

13 Plaintiffs,

14 v.

15 ROBERT BROWN, individually and dba
 ARTISTIC DRYWALL SYSTEMS, a California
 16 sole proprietorship,

17 Defendant.

18
 19 Plaintiffs respectfully request that the Case Management Conference, currently on calendar for
 20 February 11, 2016, be continued for approximately thirty (30) days. Good cause exists for the granting
 21 of the continuance as follows:

22 1. As the Court's records will reflect, this action was filed on November 13, 2015 (Dkt. #1).
 23 Defendant has not yet been served with the Complaint as the parties are working toward an informal
 24 resolution of this matter, and Plaintiffs anticipate filing an Acknowledgement of Receipt of Service of
 25 Process executed by Defendant.

26 2. Defendant requested a payment plan for the amounts owed to Plaintiffs. Plaintiffs sent
 27 Defendant a proposed Judgment Pursuant to Stipulation, which allows Defendant to make monthly
 28

1 payments to Plaintiffs to satisfy its debt. Plaintiffs are awaiting receipt of the executed Judgment
2 Pursuant to Stipulation from Defendant and, upon receipt, will file said document with the Court.

3 3. As the parties have agreed to resolve this matter informally, there are no issues that need
4 to be addressed by the parties at the currently scheduled Case Management Conference. In the interest of
5 conserving costs, as well as the Court's time and resources, Plaintiffs respectfully request that the
6 upcoming Case Management Conference be continued for approximately thirty (30) days to allow
7 sufficient time for Defendant to review and execute the Judgment Pursuant to Stipulation and for
8 Plaintiffs to file said document with the Court.

9 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled
10 action, and that the foregoing is true of my own knowledge.

11 DATED: February 4, 2016

SALTZMAN & JOHNSON LAW CORPORATION

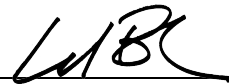
13 By: _____ /S/

14 Erica J. Russell
15 Attorney for Plaintiffs

16 IT IS SO ORDERED.

17 The currently set Case Management Conference is hereby continued to
18 March 17, 2016 at 11:00 am, and all previously set deadlines and dates
19 related to this case are continued accordingly.

20 February 5
21 DATED: _____, 2016



22 UNITED STATES DISTRICT COURT JUDGE
23 MAGISTRATE