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7 Attorneys for Plaintiffs

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

Case No.: CV 16-02339-JCS

10 PENSION PLAN FOR PENSION TRUST  
11 FUND FOR OPERATING ENGINEERS;  
12 RICHARD PIOMBO and RUSSELL E.  
BURNS, as Trustees,

13 Plaintiffs,

14 vs.

15 CLYDE WHEELER PIPELINE, INC., CLYDE  
16 WHEELER an Individual and Trustee of the  
WHEELER REVOCABLE TRUST DATED  
17 SEPTEMBER 28, 1994, MICHAEL  
WHEELER CONSTRUCTION, INC.; and  
18 DOES 1-10,

19 Defendants.

**STIPULATION EXTENDING  
DEFENDANTS' TIME TO RESPOND  
TO PLAINTIFFS' COMPLAINT**

20 Pursuant to Local Rule 6-1(a), IT IS HEREBY STIPULATED by and between Defendants  
21 Clyde Wheeler Pipeline, Inc., Clyde Wheeler, an individual and trustee of the Wheeler Revocable  
22 Trust dated September 28, 1994, and Michael Wheeler Construction, Inc., and Plaintiffs Pension  
23 Plan for Pension Trust Fund for Operating Engineers, and Richard Piombo and Russell E. Burns,  
24 as Trustees, through their attorneys of record, Raimondo & Associates, and Saltzman & Johnson  
25 Law Corporation, that Defendants' time within which to answer or otherwise respond to Plaintiffs'  
26 Complaint is extended from June 7, 2016, until June 10, 2016.

27 Plaintiffs filed a Complaint in this action on April 29, 2016. (Docket No. 1). Defendants  
28 were served on May 17, 2016. (Docket Nos. 5-11). On June 8, 2016, Plaintiffs' counsel was

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT  
CASE NO. CV 16-02339 JCS

1 informed that Defendants' have retained Raimondo & Associates to represent them in this matter,  
2 and that an extension of time to Answer the complaint until June 10, 2016, was needed. This  
3 extension constitutes the first extension of time of Defendants to file an Answer to the Complaint.  
4 This change shall not alter the date of any conference set by the Court nor will it affect the meet  
5 and confer and initial disclosure schedule.

6  
7 Dated: June 9, 2016

SALTZMAN & JOHNSON LAW CORPORATION

By: /s/

8 Anjuli M. Cargain, Esq.

9 Attorney for Plaintiffs

10 Dated: June 9, 2016

RAIMONDO & ASSOCIATES

By: /s/

11 Anthony Raimondo, Esq.

12 Attorney for Defendants

13  
14 Dated: 6/10/16

