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13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA

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

17 Plaintiffs,

18 v.

19 WESTERN ADDITION DRYWALL, INC., a  
 20 suspended California corporation, et al.,

21 Defendant.

Case No. C16-2427 EMC

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND MEDIATION  
 COMPLETION DEADLINE BY NINETY  
 DAYS**

22 The Parties to this action hereby respectfully request and stipulate to extend the deadline to hold  
 23 the mediation session by 90 days. Good cause exists for the continuance, as follows:

24 1. On June 1, 2017, the Court ordered the parties to participate in mediation within the  
 25 presumptive deadline of ninety days. (Dkt. No. 25).

26 2. On June 13, 2017, ADR Case Administrator, Alice M. Fiel notified the parties that  
 27 Robert Pohls was the assigned mediator for this case. (Dkt. No. 27).

1           3.       On July 14, 2017, the parties participated in a pre-mediation conference with Mr. Pohls  
2 and scheduled the mediation for August 28, 2017.

3           4.       The Parties agree that mediation will not be effective until the final dollar amount due  
4 can be discussed. At this time, Defendant has not yet scheduled its audit, and Defendant has not  
5 provided the missing contribution reports due to Plaintiffs.

6           5.       Defendant’s counsel is currently working to try to get the audit scheduled and to obtain  
7 the missing contribution reports.

8           7.       Once the audit has been completed, and the missing contribution reports have been  
9 provided by Defendant, then the case will be ripe for mediation, as the Parties will then be able to  
10 conduct discussions of the final dollar amount due.

11          8.       The parties therefore request that the Court extend the deadline to hold the mediation  
12 session by 90 days to allow Defendant additional time to schedule the audit and to provide the missing  
13 contribution reports.

14 DATED: August 14, 2017

**SALTZMAN & JOHNSON LAW  
CORPORATION**

16 By: \_\_\_\_\_ /S/

17 Matthew P. Minser  
18 Attorneys for Plaintiffs, District Council 16  
Nor. Cal. Health and Welfare Trust Fund, et al.

19 DATED: August 14, 2017

**HARRISON TAYLOR LAW GROUP**

20 By: \_\_\_\_\_ /S/

21 John S. Harrison  
22 Attorneys for Defendant Western Addition  
Drywall, Inc.

23 **IT IS SO ORDERED.**

24       The deadline to hold the mediation session is extended by ninety days to  
25 \_\_\_\_\_, 2017.

27 DATED: \_\_\_\_\_, 2017

28 \_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE

3. On July 14, 2017, the parties participated in a pre-mediation conference with Mr. Pohls and scheduled the mediation for August 28, 2017.

4. The Parties agree that mediation will not be effective until the final dollar amount due can be discussed. At this time, Defendant has not yet scheduled its audit, and Defendant has not provided the missing contribution reports due to Plaintiffs.

5. Defendant's counsel is currently working to try to get the audit scheduled and to obtain the missing contribution reports.

7. Once the audit has been completed, and the missing contribution reports have been provided by Defendant, then the case will be ripe for mediation, as the Parties will then be able to conduct discussions of the final dollar amount due.

8. The parties therefore request that the Court extend the deadline to hold the mediation session by 90 days to allow Defendant additional time to schedule the audit and to provide the missing contribution reports.

DATED: August 14, 2017

**SALTZMAN & JOHNSON LAW CORPORATION**

By: \_\_\_\_\_  
Matthew P. Minser  
Attorneys for Plaintiffs, District Council 16  
Nor. Cal. Health and Welfare Trust Fund, et al.

DATED: August 14, 2017

**HARRISON TAYLOR LAW GROUP**

By: John S. Harrison  
John S. Harrison  
Attorneys for Defendant Western Addition  
Drywall, Inc.

**IT IS SO ORDERED.**

The deadline to hold the mediation session is extended by ninety days to 12/1 \_\_\_\_\_, 2017. Status reset from 10/5/17 to 12/14/17 at 10:30 a.m. Updated joint status report due 12/7/17.

DATED: 8/16, 2017

UNITED STATES DISTRICT COURT JUDGE

