

1 Anne M. Bevington (SBN 111320)
abevington@sjlawcorp.com
 2 Kimberly A. Hancock (SBN 205567)
khancock@sjlawcorp.com
 3 Carol A. Treasure (SBN 225751)
ctreasure@sjlawcorp.com
 4 SALTZMAN & JOHNSON LAW CORPORATION
 5 44 Montgomery Street, Suite 2110
 San Francisco, CA 94104
 6 Telephone: (415) 882-7900
 7 Facsimile: (415) 882-9287

8 Attorneys for Plaintiffs Automotive Industries Pension Trust Fund,
 and Trustees James H. Beno, Don Crosatto, Stephen J. Mack, James Schwantz,
 9 Doug Cornford, John DiBernardo, Jose Santana, and James Wells

10 Robert F. Schwartz, No. 227327
 Clarissa A. Kang, No. 210660
 11 Jahiz Noel Agard, No. 282988
 TRUCKER ♦ HUSS
 12 A Professional Corporation
 One Embarcadero Center, 12th Floor
 13 San Francisco, CA 94111
 Telephone: (415) 788-3111
 14 Facsimile: (415) 421-2017
 E-mail: rschwartz@truckerhuss.com
 15 ckang@truckerhuss.com
jagard@truckerhuss.com

16 Attorneys for Defendants
 17 Mike Rose's Auto Body, Inc., Washington
 Township Central Investment Co., William
 18 F. Brunelli, James R. Brunelli, Andrew M.
 Brunelli, Joan M Brunelli Devries, Barbara
 19 A. Brunelli Young, Richard R. Brunelli

20 UNITED STATES DISTRICT COURT

21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22
 23 AUTOMOTIVE INDUSTRIES PENSION
 TRUST FUND, et al.,

24 Plaintiffs,

25 v.

26 MIKE ROSE'S AUTO BODY INC., a
 California corporation, et al.

27 Defendants.

Case No.: 17-cv-00602 JST

**STIPULATION AND JOINT
 REQUEST TO EXTEND THE
 DEADLINE FOR MEDIATION;
 PROPOSED ORDER**

28 STIP AND JOINT REQUEST TO CONTINUE MEDIATION DATE; ~~PROPOSED~~ ORDER

CASE NO. 17-cv-00602 JST

1 IT IS HEREBY STIPULATED by and between the parties to this action, by and through
2 their attorneys of record, and the parties jointly request that the Court permit them to extend the
3 deadline for their mediation session, currently set as September 16, 2017, to September 20, 2017
4 due to the availability of all parties and participants. The parties submit that good cause exists for
5 the following reasons.

6 1. On June 16, 2017, the parties filed a stipulation selecting ADR process and agreed
7 that mediation would be completed within 90 days from the date of the Court's order adopting the
8 stipulation. The presumptive deadline for the mediation session is Saturday, September 16, 2017.
9 (90 days from the date of the court's order adopting the stipulation) On June 18, 2017, the
10 Honorable Jon S. Tigar signed the order.

11 2. On June 20, 2017, the parties were assigned to mediator Robert Hirsch, Esq.

12 3. On July 24, 2017, the parties participated in a pre-mediation phone conference with
13 Mediator Hirsh. During that conference call with the Mediator, the parties proposed several dates
14 for scheduling the Mediation subject to the availability of all parties.

15 4. The parties intend to conduct written discovery involving the exchange of
16 documents prior to the Mediation.

17 5. On July 26, 2017, the parties essential to resolving the case confirmed their
18 availability to hold the mediation on September 20, 2017.

19 6. For the reasons stated above, the parties respectfully request that the Court permit
20 the parties to hold the mediation session on September 20, 2017, which should allow sufficient
21 time to complete the ADR process well in advance of Trial, scheduled for October 29, 2018.

22 7. The parties respectfully request that the Court approve this stipulation and
23 incorporate its terms in an Order.

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IT IS SO STIPULATED.

SALTZMAN & JOHNSON LAW CORPORATION

DATED: July 27, 2017

By: /S/ Carol A. Treasure
Anne M. Bevington
Kimberly Hancock
Carol A. Treasure
Attorneys for Plaintiffs

TRUCKER ♦ HUSS

DATED: July 27, 2017

By: /S/ Robert Schwartz
Robert Schwartz
Attorneys for Defendants

CERTIFICATION RE SIGNATURES

I attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: July 27, 2017

/s/ Carol A. Treasure
CAROL A. TREASURE

IT IS SO ORDERED.

Dated: July 31, 2017



HON. JON S. TIGAR
United States District Judge