Boards of Tr	stees of the Sheet Metal Workers Local 104 Health Care .	tric Buildings Americas, Inc.	D			
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10	Attorneys for Defendant					
11	SCHNEIDER ELECTRIC BUILDINGS AMERICA	S, INC.				
12						
13	UNITED STATES I	DISTRICT COURT				
14	NORTHERN DISTRIC	CT OF CALIFORNIA				
15	BOARD OF TRUSTEES OF THE SHEET	Case No. 3:17-cv-02567-RS				
16	METAL WORKERS LOCAL 104 HEALTH CARE TRUST;	STIPULATED REQUEST AND				
17	SHEET METAL WORKERS PENSION TRUST	[PROPOSED] ORDER FOR FURTHER CONTINUANCE OF CASE				
18	OF NORTHERN CALIFORNIA;	MANAGEMENT CONFERENCE,				
19	SHEET METAL WORKERS LOCAL 104	DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT, AND				
20	SUPPLEMENTAL PENSION FUND;	DEADLINE TO SELECT ADR PROCESS AND FILE ADR STIPULATIONS	\$			
	SHEET METAL WORKERS LOCAL 104	AS MODIFIED BY THE COURT				
21	VACATION-HOLIDAY SAVINGS FUND;	Complaint Filed: May 4, 2017				
22	SHEET METAL WORKERS LOCAL 104 AND BAY AREA INDUSTRY TRAINING FUND;					
23	RICK WERNER, TRUSTEE; and					
24	SHEET METAL WORKERS INTERNATIONAL					
25	ASSOCIATION LOCAL UNION 104,					
26	Plaintiffs,					
20						
28	STIPULATED REQUEST AND [PROPOSED] ORD MANAGEMENT CONFERENCE, DEADLINE FOR DE					
	DEADLINE TO SELECT ADR PROCES					

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SCHNEIDER ELECTRIC BUILDINGS AMERICAS, INC., a Delaware corporation.,

v.

Defendant.

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and 16-2(e), and ADR Local Rule 3-5, Plaintiffs BOARD OF TRUSTEES OF THE SHEET METAL WORKERS LOCAL 104 HEALTH CARE TRUST; SHEET METAL WORKERS PENSION TRUST OF NORTHERN CALIFORNIA; SHEET METAL WORKERS LOCAL 104 SUPPLEMENTAL PENSION FUND; SHEET METAL WORKERS LOCAL 104 VACATION-HOLIDAY SAVINGS FUND; SHEET METAL WORKERS LOCAL 104 AND BAY AREA INDUSTRY TRAINING FUND; RICK WERNER, TRUSTEE; and SHEET METAL WORKERS INTERNATIONAL ASSOCIATION LOCAL UNION 104, (collectively, "Plaintiffs") and Defendant SCHNEIDER ELECTRIC BUILDINGS AMERICAS, INC. ("Defendant") (collectively, "the Parties"), by and through their counsel, HEREBY STIPULATE AND AGREE AS FOLLOWS:

WHEREAS, presently, the deadline for the parties to select an ADR process or file a notice of need for ADR phone conference was December 5, 2017. The deadline for Defendant to respond to Plaintiffs' Complaint is December 15, 2017, and an initial Case Management Conference is scheduled for December 21, 2017.

WHEREAS, the Parties are in the process of negotiating a potential resolution to this action. Due to the fact that the negotiation and settlement process requires input from Plaintiff's Board of Trustees and to other scheduling difficulties, the negotiation of a potential settlement and accompanying paperwork is not yet complete. A few weeks ago, Plaintiffs presented to Defendant a proposed declaration as part of Plaintiffs' settlement proposal, which at this time is under consideration with Defendant. The Parties are working diligently and in good faith to complete a settlement, and hope to reach an agreement within the next sixty days. In the interest of conserving judicial and party resources while the Parties continue to attempt to settle this matter, the Parties respectfully request that

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STIPULATED REQUEST AND [PROPOSED] ORDER FOR FURTHER CONTINUANCE OF CASE MANAGEMENT CONFERENCE, DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT, AND DEADLINE TO SELECT ADR PROCESS AND FILE ADR STIPULATIONS

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1	the Court issue a 60-day continuance of all deadlines in this matter, as set forth below. If the Parties			
2	reach an agreement within the next 60 days, the Parties will promptly notify the Court.			
3	WHEREAS, pursuant to Local Civil Rule 6-2(a)(2), the Parties provide that pursuant to prior			
4	requests, the Court has previously granted continuances in this matter. On August 24, 2017, the Court			
5	ordered that the CMC was continued to October 26, 2017. On October 6, 2017, the Court extended the			
6	deadline for the parties to select an ADR process or file a notice of need for ADR phone conference, to			
7	December 5, 2017. On October 11, 2017, the Court continued the deadline for Defendant to respond to			
8	the Complaint to December 15, 2017, and continued the CMC to December 21, 2017.			
9	NOW THEREFORE, the Parties respectfully request that the Court extend present deadlines as			
10	follows:			
11	February 5, 2018: Deadline for the parties to select an ADR process of file a notice of need for			
12	ADR conference;			
13	February 15, 2018: Deadline for Defendant to respond to the Complaint; and			
14	February 22, 2018: Case Management Conference.			
15	All other related deadlines shall be continued accordingly.			
16	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.			
17	DATED: December 7, 2017 Respectfully submitted,			
18	SEYFARTH SHAW LLP			
19				
20	By: /s/ Michelle M. Scannell			
21	Kathleen Cahill Slaught Michelle Scannell			
22	Attorneys for Defendant SCHNEIDER ELECTRIC BUILDINGS AMERICAS, INC.			
23	INC.			
24				
25				
26				
27				
28	3 STIPULATED REQUEST AND [PROPOSED] ORDER FOR FURTHER CONTINUANCE OF CASE MANAGEMENT CONFERENCE, DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT, AND DEADLINE TO SELECT ADR PROCESS AND FILE ADR STIPULATIONS			

DATED: December 7, 2017	Respectfully submitted,		
	SALTZMAN & JOHNSON LAW CORPORATION		
	By: /s/ Michele R. Stafford Michele R. Stafford		
	Matthew P. Minser		
	Attorneys for Plaintiffs BOARD OF TRUSTEES OF THE SHEET METAL WORKERS LOCAL 104 HEALTH CARE TRUST.		
	WORKERS LOCAL 104 HEALTH CARE TRUST; SHEET METAL WORKERS PENSION TRUST OF NORTHERN CALIFORNIA; SHEET METAL		
	WORKERS LOCAL 104 SUPPLEMENTAL PENSION FUND; SHEET METAL WORKERS LOCAL 104		
	VACATION-HOLIDAY SAVINGS FUND; SHEET METAL WORKERS LOCAL 104 AND BAY AREA		
	INDUSTRY TRAINING FUND; RICK WERNER, TRUSTEE; and SHEET METAL WORKERS		
	INTERNATIONAL ASSOCIATION LOCAL UNION 104		
SIGNATURE ATTESTATION			
-	Michelle Scannell, attests that concurrence in the filing of this		
document has been obtained from co			
DATED: December 7, 2017	SEYFARTH SHAW LLP		
	By:/s/ Michelle M. Scannell		
	Kathleen Cahill Slaught Michelle Scannell		
	Attorneys for Defendant SCHNEIDER ELECTRIC BUILDINGS		
	AMERICAS, INC.		
	4		
STIPULATED REQUEST AND [PROPOS	4 SED] ORDER FOR FURTHER CONTINUANCE OF CASE MANAGEMENT		
	ENDANT TO RESPOND TO COMPLAINT, AND DEADLINE TO SELECT ROCESS AND FILE ADR STIPULATIONS		

	[PROPOSED] ORDER DUDSUANT TO STIDULATION IT IS SO OPDERED, the Court grants the Parties'
	PURSUANT TO STIPULATION, IT IS SO ORDERED , the Court grants the Parties'
	Stipulated Request and sets the following deadlines in this matter:
	February 5, 2018: Deadline for the parties to select an ADR process of file a notice of need for
	ADR conference;
February 15, 2018: Deadline for Defendant to respond to the Complaint; and March 8, 2018 February 22, 2018, 10:00 a.m.: Case Management Conference.	
	All other related deadlines shall be continued accordingly.
	γ_{1101}
	DATED: 12/8/17
	District Judge Richard Seeborg
	5
	5 STIPULATED REQUEST AND [PROPOSED] ORDER FOR FURTHER CONTINUANCE OF CASE MANAGEMEN