1 2	ERSKINE & TULLEY A PROFESSIONAL CORPORATION MICHAEL J. CARROLL (St. Bar #50246)
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5	Attorneys for Plaintiffs
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8	UNITED STATES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA
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13	NORTHWEST ADMINISTRATORS, INC.,) NO. C 09 2142 PJH
14)
15	Plaintiffs,)) JOINT CASE MANAGEMENT
16	vs.) STATEMENT; REQUEST) FOR CONTINUANCE
17))
18	US PARKING ,INC., a California) corporation) CASE MANAGEMENT CONFERENCE
19) DATE: 12/3/09
20	Defendants.) TIME: 2:00 p.m.
21	The parties to the above-entitled action jointly submit this
22	Case Management Statement.
23	A brief description of the events underlying the action:
24	This is an ERISA collection action against an employer who has ceased
25	operations at all but one location.
26	Service was accomplished on June 4, 2009. An answer has not
27	been filed. The parties have been engaged in good faith negotiations
28	but the financial condition of defendant precludes a settlement.
	JOINT CASE MANAGEMENT STATEMENT; REQUEST FOR CONTINUANCE

11/25/09 WED 11:50 FAX 415 3921978

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Bankruptcy is no longer being considered.

Defendant's counsel has been instructed not to file an answer, and to allow a default to be taken.

To save judicial time we request a sixty day continuance during which time a default can be taken and a motion for default judgment be prepared.

Respectfully submitted.

DATED: November 2, 2009

ERSKINE & TULLEY)
A PROFESSIONAL CORPORATION

Dated: November <u>A</u>5, 2009

Michael J. Carroll Attorneys for Plaintiff

SCHWARTZ & CERA LLP

Ву:

Scott R. Lovernick Attorneys for Defendant

THE CASE MANAGEMENT CONFERENCE IS CONTINUED TO 2/4/10 AT 2:00 P.M.

12/1/09



JOINT CASE MANAGEMENT STATEMENT; REQUEST FOR CONTINUANCE

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