

1 RICHARD C. JOHNSON (SBN 40881)  
 SHAAMINI A. BABU (SBN 230704)  
 2 SALTZMAN & JOHNSON LAW CORPORATION  
 44 Montgomery Street, Suite 2110  
 3 San Francisco, CA 94104  
 (415) 882-7900  
 4 (415) 882-9287 – Facsimile  
 djohnson@sjlawcorp.com  
 5 sbabu@sjlawcorp.com  
 Attorneys for Plaintiffs

6  
 7  
 8 UNITED STATES DISTRICT COURT  
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 10 (OAKLAND DIVISION)

11 OPERATING ENGINEERS’ PENSION  
 TRUST FUND; F.G. CROSTHWAITE and  
 12 RUSSELL E. BURNS, as Trustees,

Case No.: CV 10-04964 SBA

13 Plaintiffs,

**STIPULATION TO EXTEND TIME  
 FOR JOINDER OF PARTIES AND TO  
 AMEND PLEADINGS AND ORDER**

14 vs.

15 TERRARESEARCH, a California Corporation, 3  
 MAK, LLC, a California Limited Liability  
 16 Company, and DOES 1-20,

17 Defendants.

18  
 19 The parties filed a Joint Case Management Statement on February 15, 2012. Docket No.  
 20 72. A Case Management Conference was held via telephone on February 22, 2012. Docket No.  
 21 73. Thereafter, the Court issued an Order for Pre-Trial Preparation on February 27, 2012, and  
 22 specified May 1, 2012, as the deadline to join parties and amend the pleadings. Docket No. 74.  
 23 On May 1, 2012, parties stipulated to an extension of 10-days until Friday, May 11, 2012, for  
 24 Plaintiffs to join additional parties and amend the Complaint if necessary. All other deadlines  
 25 specified in the stipulation for Pre-Trial Preparation were to remain unchanged. Docket 76. The  
 26 court approved the extension on May 2, 2012. Docket 77.

1 The parties are continuing to attempt to resolve the pending dispute and hereby stipulate to  
2 an additional extension of 21-days until Friday, June 1, 2012, for Plaintiffs to join additional  
3 parties and amend the Complaint if necessary. All other deadlines specified in the Order for Pre-  
4 Trial Preparation will remain unchanged. As such, the parties respectfully request the Court to  
5 extend the deadline for joinder and to amend the pleadings to June 1, 2012.

6  
7 Dated: May 9, 2012

SALTZMAN & JOHNSON LAW CORPORATION

8

9

By: \_\_\_\_\_ /s/  
Shaamini A. Babu  
Attorneys for Plaintiff

10

11

12 Dated: May 9, 2012

LITTLER MENDELSON P.C.

13

14

By: \_\_\_\_\_ /s/  
Stephen C. Tedesco  
Attorneys for Defendants \_\_\_\_

15

16 IT IS SO ORDERED.

17 Based on the foregoing, and good cause appearing, the parties shall have until June 1,  
18 2012, to join other parties and amend the pleadings. All other deadlines specified in the Order for  
19 Pre-Trial Preparation will remain unchanged.

20

21

22

23 Date: \_\_\_5/10/12

\_\_\_\_\_  
*Sandra B. Armstrong*  
SAUNDRA ARMSTRONG  
United States District Court Judge

24

25

26

27

28