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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 THE BOARD OF TRUSTEES, in their capacities
 as Trustees of the LABORERS HEALTH AND
 13 WELFARE TRUST FUND
 FOR NORTHERN CALIFORNIA; LABORERS
 14 VACATION-HOLIDAY TRUST FUND FOR
 NORTHERN CALIFORNIA; LABORERS
 15 PENSION TRUST FUND FOR NORTHERN
 CALIFORNIA; and LABORERS TRAINING
 16 AND RETRAINING TRUST FUND FOR
 NORTHERN CALIFORNIA,

17 Plaintiff,

18 v.

19 TITAN DVBE INCORPORATED, a California
 20 Corporation

21 Defendant.

No. C 12-06044 DMR

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE;
 [PROPOSED] ORDER**

1 Pursuant to Civil Local Rules 7-12 and 16-2, Plaintiffs THE BOARD OF TRUSTEES, in
2 their capacities as Trustees of the LABORERS HEALTH AND WELFARE TRUST FUND FOR
3 NORTHERN CALIFORNIA; LABORERS VACATION-HOLIDAY TRUST FUND FOR
4 NORTHERN CALIFORNIA; LABORERS PENSION TRUST FUND FOR NORTHERN
5 CALIFORNIA; and LABORERS TRAINING AND RETRAINING TRUST FUND FOR
6 NORTHERN CALIFORNIA (hereinafter "Plaintiffs"), by and through the undersigned counsel,
7 and Defendant TITAN DVBE, INC., a California Corporation (hereinafter "Defendant"), by and
8 through the undersigned counsel, hereby respectfully request that the Case Management
9 Conference currently scheduled for August 21, 2013 at 1:30pm be continued for ninety days.

10 The parties are involved in ongoing settlement negotiations regarding the results of the
11 payroll audit of Defendant's books and records. The parties are continuing to exchange
12 information and are optimistic they will be able to resolve their disputes prior to any rescheduled
13 Case Management Conference. The negotiations and exchange of information conducted thus far
14 have already significantly focused the issues of the case. Even if the parties are not able to
15 resolve this matter fully, having this meeting will significantly narrow what facts and claims are
16 in dispute. Accordingly, the parties respectfully request that the August 21, 2013 Case
17 Management Conference be continued for ninety days.

18
19 Dated: August 14, 2013

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

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21 By: /s/ Daniel S. Brome
DANIEL S. BROME
Attorneys for Plaintiffs

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23 Dated: August 14, 2013

COOK BROWN LLP

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25 By: /s/ Debra Hinshaw Vierra
DEBRA HINSHAW VIERRA
Attorneys for Defendant

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[PROPOSED] ORDER

Based upon the foregoing Stipulation to Continue Case Management Conference, the Court orders the continuance of the August 21, 2013 Case Management Conference ~~for ninety~~ ~~(90) days, or as soon thereafter as a court date is available. In addition, the Court Orders:~~ to Nov. 20, 2013 at 1:30 p.m. The Case Management Statement is due Nov. 13, 2013.

Dated: Aug. 16, 2013



HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE

132311/721101