

1 Michele R. Stafford, Esq. (SBN 172509)
 Erica J. Russell, Esq. (SBN 274494)
 2 SALTZMAN & JOHNSON LAW CORPORATION
 44 Montgomery Street, Suite 2110
 3 San Francisco, CA 94104
 (415) 882-7900 – Phone
 4 (415) 882-9287 – Facsimile
mstafford@sjlawcorp.com
 5 erussell@sjlawcorp.com

6 Attorneys for Plaintiffs

7 Maria Anastas, Esq. (SBN 229787)
 Joseph L.J. Appel, Esq. (SBN 276946)
 8 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 Steuart Tower, Suite 1300
 9 One Market Plaza
 San Francisco, CA 94105
 10 (415) 442-4810 – Phone
 (415) 442-4870 – Facsimile
 11 maria.anastas@ogletreedeakins.com
joseph.appel@ogletreedeakins.com

12 Attorneys for Defendant

14 UNITED STATES DISTRICT COURT

15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 NORTHERN CALIFORNIA GLAZIERS,
 ARCHITECTURAL METAL AND GLASS
 17 WORKERS PENSION TRUST FUND, et al.,

18 Plaintiffs,

19 v.

20 LEDEIT & SONS GLASS, INC., a California
 corporation,

21 Defendant.

Case No.: C13-5378 SA

**JOINT REQUEST FOR CONTINUANCE
 OF CASE MANAGEMENT
 CONFERENCE; CORRECTED ORDER
 THEREON**

Date: June 26, 2014

Time: 2:30 p.m.

Ctrm: 1, 4th Floor

1301 Clay Street

Oakland, California

Judge: Honorable Sandra Brown Armstrong

23 Plaintiffs and Defendant respectfully request that the Case Management Conference
 24 scheduled for June 26, 2014, at 2:30 p.m., be continued for approximately thirty (30) days. Good
 25 cause exists for the continuance, as follows:

26 1. As the Court's records will reflect, this action was filed on November 30, 2013 to
 27 compel Defendant's compliance with its collective bargaining agreement in relation to amounts
 28 found due on an audit of its payroll records for the period of January 1, 2010 through March 31,

**JOINT REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER THEREON**

Case No.: C13-5378 SA

1 2013. (Dkt. #1).

2 2. Service on Defendant was effectuated on November 21, 2013. A Proof of Service
3 of Summons was filed with the Court. (Dkt. #8).

4 3. Defendant filed an Answer to the Complaint on December 26, 2013. (Dkt. #13).

5 4. Plaintiffs requested that a further audit of Defendant's payroll records be performed
6 for the period from April 1, 2013 through the present.

7 5. Plaintiffs' auditors completed the further audit of Defendant's records for the
8 period from April 1, 2013 through the present and the audit report was finalized and issued on
9 April 29, 2014.

10 6. In addition, the audit report for the period of January 1, 2010 through March 31,
11 2013 was revised to reflect a reduction of amounts owed for Richard Ledoit for the time period
12 from January 1, 2013 through March 31, 2013 as Mr. Ledoit was eligible not to contribute to the
13 Trust Funds on behalf of himself as an owner-member during that time period. The revised audit
14 report was finalized and issued on May 16, 2014.

15 7. Plaintiffs have been informed by the Trust Funds' administrator that Defendant has
16 failed to report and pay April 2014 contributions, which were due on May 15, 2014 and delinquent
17 when not received by May 31, 2014. Plaintiffs have requested that Defendant submit its April
18 2014 contribution report so that Plaintiffs can determine how much is owed for that month,
19 including liquidated damages and interest incurred on the delinquent contributions.

20 8. The parties have been continuing to work toward an informal resolution of this
21 matter and Defendant has requested a payment plan to satisfy its debt owed to Plaintiffs.

22 9. Plaintiffs and Defendant therefore respectfully request that the Case Management
23 Conference, currently scheduled for June 26, 2014, be continued for approximately thirty (30)
24 days to allow sufficient time for the parties to finalize the informal resolution of this matter.

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1 10. There are no issues that need to be addressed by this Court at the currently
2 scheduled Case Management Conference. In the interest of conserving costs as well as the Court's
3 time and resources, both parties respectfully request that the Court continue the currently
4 scheduled Case Management Conference.

5 Dated: June 13, 2014

**SALTZMAN & JOHNSON
LAW CORPORATION**

6
7 By: /s/
Erica J. Russell
Attorneys for Plaintiffs

8
9 Dated: June 13, 2014


**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

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11 By: /s/
Joseph L.J. Appel
Attorneys for Defendant

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14 IT IS SO ORDERED.

15 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Telephonic
16 Case Management Conference is hereby continued to **July 31, 2014, at 2:30 p.m.**, and all related
17 deadlines are extended accordingly. The parties shall **meet and confer** prior to the conference and
18 shall prepare a joint Case Management Conference Statement which shall be filed no later than
19 seven (7) days prior to the Case Management Conference that complies with the Standing Order
For All Judges Of The Northern District Of California and the Standing Order of this Court.
Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call.
All parties shall be on the line and shall call (510) 879-3550 at the above indicated date and time.

20 Date: 6/16/2014



THE HONORABLE SAUNDRA BROWN ARMSTRONG
UNITED STATES DISTRICT COURT

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