Bricklayers Local N	o. 3 Pension Trust and its Board of Tr	ustees et al v. So	uth Valley Masor	nry, Inc.	Doc	
	Case4:14-cv-03515-JSW	Document18	Filed11/06/1	.4 Page1 of 3		
1 2 3 4 5 6	Michele R. Stafford, Esq. (SBN 1 Erica J. Russell, Esq. (SBN 27449 Adrian L. Canzoneri (SBN 26516 SALTZMAN & JOHNSON LAW 44 Montgomery Street, Suite 2116 San Francisco, CA 94104 (415) 882-7900 – Telephone (415) 882-9287 – Facsimile <u>mstafford@sjlawcorp.com</u> <u>erussell@sjlawcorp.com</u>	94) 88) V CORPORATIO	ON			
7	Attorneys for Plaintiffs					
8						
9	UNITED STATES DISTRICT COURT					
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA					
11						
12	BRICKLAYERS LOCAL NO. 3 TRUST, et al.	PENSION	Case No.: C14	4-03515 JSW		
13				S' REQUEST TO CONTIN		
14	Plaintiffs,		CASE MANAGEMENT CONFERENCE; [ <del>PROPOSED]</del> ORDER THEREON			
15	V.		Date:	November 14, 2014		
16	SOUTH VALLEY MASONRY, California Corporation,	INC., a	Time: Location:	11:00 a.m. 1301 Clay Street		
17	Defendant.			Oakland, CA 94612 Courtroom 5, 2 <sup>nd</sup> Floor		
18			Judge:	Honorable Jeffrey S. White		
19	Plaintiffs respectfully request that the Case Management Conference, currently on calendar					
20	for November 14, 2014, be continued for approximately sixty (60) days. Good cause exists for the					
21	granting of the continuance, as follows:					
22	1. As the Court's records will reflect, this action was filed on August 4, 2014.					
22	Defendant was served on August 11, 2014, and Proof of Service of Summons was filed with the					
23 24						
24	Court on August 18, 2014 (Dkt. #11). Defendant failed to plead or otherwise respond to the					
	lawsuit, and the Clerk entered default as to Defendant on September 8, 2014 (Dkt. #15).					
26	Defendant was duly served with a copy of the Clerk's Notice of Default Entry, and a Proof of Service of same was filed with the Court on September 18, 2014 (Dkt. #16).					
27	Service of same was filed with the	e Court on Septe	ander 18, 2014	(DKL. #10).		
28		<b>N</b>			-1-	
		REQUEST TO	CONTINUE CA	SE MANAGEMENT CONFER Case No.: C14-03515		

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1	2. Plaintiffs are preparing a Motion for Default Judgment, and will be filing the					
2	Motion within the next fourteen (14) days. Accordingly, Plaintiffs respectfully request that the					
3	Case Management Conference, currently scheduled for November 14, 2014, be continued for sixty					
4	(60) days to allow for the preparation and filing of Plaintiffs' Motion for Default Judgment.					
5	3. There are no issues that need to be addressed by the parties at the currently					
6	scheduled Case Management Conference. In the interest of conserving costs, as well as the					
7	Court's time and resources, Plaintiffs respectfully request that the Court continue the currently					
8	scheduled Case Management Conference.					
9	I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above					
10	entitled action, and that the foregoing is true of my own knowledge.					
11	Executed this 6 <sup>th</sup> day of November, 2014, at San Francisco, California.					
12	SALTZMAN & JOHNSON					
13	LAW CORPORATION					
14	By:/S/					
15	Erica J. Russell Attorneys for Plaintiffs					
16						
17						
18	IT IS SO ORDERED.					
19	The currently set Case Management Conference is hereby continued to					
20	January 16, 2015 at 11:00 a.m., and all previously set deadlines and dates related to this					
21	case are continued accordingly.					
22	Date: November 10, 2014					
23	HONORABLE JEFFREY S. WHITE					
24	UNITED STATES DISTRICT COURT JUDGE					
25						
26						
27						
28	-2-					
	REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE Case No.: C14-03515 JSW					