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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN JOSE DIVISION

14 BOARD OF TRUSTEES OF THE  
 15 LABORERS HEALTH AND WELFARE  
 16 TRUST FUND FOR NORTHERN  
 17 CALIFORNIA; BOARD OF TRUSTEES OF  
 18 THE LABORERS VACATION-HOLIDAY  
 19 TRUST FUND FOR NORTHERN  
 20 CALIFORNIA; BOARD OF TRUSTEES OF  
 21 THE LABORERS PENSION TRUST FUND  
 22 FOR NORTHERN CALIFORNIA; and  
 23 BOARD OF TRUSTEES OF THE  
 24 LABORERS TRAINING AND RETRAINING  
 25 TRUST FUND FOR NORTHERN  
 26 CALIFORNIA,

27 Plaintiffs,

28 vs.

VALLEY DEMOLITION, INC., a California  
 Corporation,

Defendant.

Case No.: 5:16-cv-01171-BLF

**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE;  
~~PROPOSED~~ ORDER THEREON**

**Date: June 9, 2016**

**Time: 11:00 a.m.**

**Location: Ctrm. 3, 5<sup>th</sup> Floor  
 San Jose Division**

**Before: Hon. Beth Labson Freeman**

**STIPULATION**

IT IS HEREBY STIPULATED by and between Plaintiffs, on the one hand, and  
 Defendant, on the other hand, through their respective counsel, that this Court continue the Case  
 Management Conference for a 30 days in order to allow the parties further time to continue  
 settlement negotiations.

1 On June 1, 2016, the parties filed the Stipulation And [Proposed] Order Selecting ADR  
2 Process [Document 16] and Joint Case Management Conference Statement [Document 17].

3 The parties have agreed to Early Neutral Evaluation should they be unable to negotiate a  
4 settlement through informal means. The parties are actively engaging in informal settlement  
5 negotiations and request a 30-day continuance of the Case Management Conference to continue  
6 informal settlement negotiations in an attempt to settle the case.

7  
8 DATED: June 2, 2016

9 BULLIVANT HOUSER BAILEY PC

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11 By /s/ Ronald L. Richman  
12 Ronald L. Richman

13 Attorneys for Plaintiffs

14 DATED: June 2, 2016

15 THE LITIGATION LAW GROUP

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17 By /s/ Michelle Cruz  
18 Michelle Cruz

19 Attorneys for Defendant  
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**ORDER**

The parties having so stipulated, and good cause appearing,

IT IS HEREBY ORDERED that the Case Management Conference be continued to \_\_\_\_\_, 2016 at 11:00 a.m., Courtroom 3, 5<sup>th</sup> Floor, San Jose Division.

DATED: June \_\_, 2016

By:   
HON. BETH LABSON FREEMAN  
UNITED STATES DISTRICT JUDGE

4834-3321-5282.1