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 21 Aerospace Workers, Local Lodge No. 93,
 22 International Brotherhood of Teamsters,
 23 Chauffeurs, Warehousemen and Helpers of
 24 America, Local No. 890, and International
 25 Brotherhood of Electrical Workers, Local No.
 26 234

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Attorneys for Defendant
 International Union of Operating Engineers
 Local No. 3

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA- SAN JOSE DIVISION

LHOIST NORTH AMERICA OF ARIZONA,
 INC.,

Plaintiff,

vs.

Case Number: 5:16-cv-1331

**JOINT STIPULATION AND
 [PROPOSED] ORDER CONTINUING
 CASE MANAGEMENT CONFERENCE**

1 INTERNATIONAL ASSOCIATION OF
2 MACHINISTS AND AEROSPACE
3 WORKERS, LOCAL LODGE NO. 93,
4 INTERNATIONAL BROTHERHOOD OF
5 TEAMSTERS, CHAUFFEURS,
6 WAREHOUSEMEN AND HELPERS OF
7 AMERICA, LOCAL NO. 890,
8 INTERNATIONAL BROTHERHOOD OF
9 BOILERMAKERS, IRON SHIP BUILDERS,
10 BLACKSMITHS, FORGERS AND HELPERS,
11 AFL-CIO, CEMENT, LIME, GYPSUM AND
12 ALLIED WORKERS DIVISION, DNCL,
13 INTERNATIONAL BROTHERHOOD OF
14 ELECTRICAL WORKERS, LOCAL NO. 234,
15 AND INTERNATIONAL UNION OF
16 OPERATING ENGINEERS, LOCAL NO. 3,

Defendants.

11 Pursuant to United States District Court, Northern District of California Local Rule 6-2,
12 the following Stipulation is entered into by Plaintiff LHOIST NORTH AMERICA OF
13 ARIZONA, INC. ("Plaintiff") and Defendants INTERNATIONAL ASSOCIATION OF
14 MACHINISTS AND AEROSPACE WORKERS, LOCAL LODGE NO. 93, INTERNATIONAL
15 BROTHERHOOD OF TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS
16 OF AMERICA, LOCAL NO. 890, INTERNATIONAL BROTHERHOOD OF ELECTRICAL
17 WORKERS, LOCAL NO. 234, AND INTERNATIONAL UNION OF OPERATING
18 ENGINEERS, LOCAL NO. 3 ("Defendants") (collectively, the "Parties") by and through their
19 counsel of record:

20 WHEREAS, the Court scheduled a case management conference in the above-referenced
21 matter for June 15, 2016; and

22 WHEREAS, Plaintiff has filed a Complaint; and

23 WHEREAS, Defendants have filed a Motion to Dismiss the Complaint with prejudice;
24 and

25 WHEREAS, Defendant's Motion to Dismiss is noticed to be heard on June 29, 2016; and

26 WHEREAS, Defendant THE INTERNATIONAL BROTHERHOOD OF
27 BOILERMAKERS, IRON SHIP BUILDERS, BLACKSMITHS, FORGERS AND HELPERS,
28 AFL-CIO, CEMENT, LIME, GYPSUM, AND ALLIED WORKERS DIVISION, DNCL has yet

1 to make an appearance in this case; and

2 WHEREAS, Plaintiffs and Defendant seek to preserve the time and resources of the
3 Parties and the Court;

4 IT IS HEREBY STIPULATED AS FOLLOWS:

5 The June 15, 2016 case management conference is continued sixty-three (63) days to
6 August 17, 2016, or to such a date thereafter as the Court may set. The deadlines to complete
7 pre-case management conference tasks including, but not limited to, the service of initial
8 disclosure statements and the filing of a joint case management conference statement, are
9 similarly continued to dates consistent with the continued August 17, 2016 case management
10 conference.

11 Dated: May 31, 2016

JACKSON LEWIS P.C.

12
13 By: /s/ Conor J. Dale
14 Dan Hartsfield
15 Conor J. Dale
16 Attorneys for Plaintiff
17 LHOIST NORTH AMERICA OF
18 ARIZONA, INC.

16 Dated: May 31, 2016

WEINBERG, ROGER & ROSENFELD

18 By: /s/ Caren P. Sencer
19 David A. Rosenfeld
20 Caren P. Sencer
21 Attorneys for Defendants
22 INTERNATIONAL ASSOCIATION OF
23 MACHINISTS AND AEROSPACE
24 WORKERS, LOCAL LODGE NO. 93,
25 INTERNATIONAL BROTHERHOOD OF
26 TEAMSTERS, CHAUFFEURS,
27 WAREHOUSEMEN AND HELPERS OF
28 AMERICA, LOCAL NO. 890, AND
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS, LOCAL NO.
234

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Dated: May 31, 2016

LAW OFFICE OF KENNETH C. ABSALOM

By: /s/ George R. Nemiroff
Kenneth C. Absalom
George R. Nemiroff
Attorneys for Defendant
INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL NO. 3

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: June 2, 2016

