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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GIL CROSTHWAITE, et al., as Trustees of the
OPERATING ENGINEERS HEALTH AND
WELFARE TRUST FUND FOR NORTHERN
CALIFORNIA; et al.,

Plaintiffs,
v.

R.E. SERRANO, INC., and RICKY
SERRANO,

Defendants.

Case No.: C07-1697 MMC

**STIPULATION FOR CONTINUANCE OF
CASE MANAGEMENT CONFERENCE**

DATE: September 7, 2007

TIME: 10:30 a.m.

COURTROOM: 7, 19th Floor

JUDGE: The Honorable Maxine M. Chesney

The parties herein stipulate and respectfully request that the Case Management Conference, currently scheduled for September 7, 2007 at 10:30 a.m., be continued for approximately 60 days as follows:

1. Counsel for Plaintiffs was substituted in this case on June 7, 2007, and reviewed the file in this matter to determine the status of the parties' positions. Counsel thereafter wrote to defendant's counsel Paul Simpson, Esq., to provide him the information requested in his last communication with prior counsel, and to request a proposal for resolution.

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1 2. Mr. Simpson advised that he was leaving for vacation but was forwarding that
2 letter to his client to review in the next week(s). Mr. Simpson now advises that he recently has
3 attempted to make contact with his client, who has not responded and may himself now be on
4 vacation.

5
6 3. The parties have therefore not yet had the opportunity to identify any disputes or
7 resolution thereof, and it is expedient that they do so, in the interest of saving the time of both the
8 parties and the court.

9 4. Both parties therefore respectfully request that the Case Management Conference,
10 currently scheduled for September 7, 2007, be continued for approximately 60-90 days to allow
11 the parties to amend, or to resolve this action by stipulation or motion.

12 5. It is furthermore requested that all previously set deadlines and dates related to this
13 case be continued as well.
14

15 Dated: August 30, 2007

SALTZMAN & JOHNSON LAW CORPORATION

16
17 By: Muriel B. Kaplan

Muriel B. Kaplan
Attorneys for Plaintiffs

18
19 Dated: August 30, 2007

SIMPSON, GARRITY & INNES

20
21 By: Paul Simpson

Paul Simpson
Attorneys for Defendants

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23 IT IS SO ORDERED.

24
25 The currently set Case Management Conference is hereby continued to
November 2, 2007 at 10:30 a.m. The parties shall file a joint Case
26 Management Statement no later than October 26, 2007.

27 Date: August 31, 2007

28 Margaret M. Cheney
United States District Court Judge

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