1 2 3 4 5 6 7 8	Muriel B. Kaplan, Esq. (SBN 124607) Michele R. Stafford, Esq. (SBN 172509) SALTZMAN & JOHNSON LAW CORPORATI 120 Howard Street, Suite 520 San Francisco, CA 94105 (415) 882-7900 (415) 882-9287 – Facsimile mkaplan@sjlawcorp.com mstafford@sjlawcorp.com  Attorneys for Plaintiffs  UNITED STATES	
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10	FOR THE NORTHERN DI	STRICT OF CALIFORNIA
11	GIL CROSTHWAITE, RUSS BURNS, in their	Case No.: C07-1697 MMC
12	respective capacities as Trustees of the OPERATING ENGNEERS HEALTH AND	REQUEST FOR CONTINUANCE OF
13	WELFARE TRUST FUND FOR NORTHERN CALIFORNIA; PENSION TRUST FUND FOR	CASE MANAGEMENT CONFERENCE
14	OPERATING ÉNGINEERS; PENSIONED OPERATING ENGINEERS HEALTH AND	DATE: July 6, 2007
15	WELFARE FUND; OPERATING	TIME: 10:30 a.m.
	ENGINEERS AND PARTICIPATING EMPLOYERS PRE-APPRENTICESHIP,	COURTROOM: 7, 19 <sup>th</sup> Floor
16	APPRENTICE AND JOURNEYMEN AFFIRMATIVE ACTION TRAINING FUND;	JUDGE: The Honorable Maxine M. Chesney
17	OPERATING ENGINEERS VACATION AND	
18	HOLIDAY PLAN; OPERATING ENGINEERS CONTRACT ADMINISTRATION TRUST	
19	FUND; OPERATING ENGINEERS MARKET PRESERVATION TRUST FUND;	
20	OPERATING ENGINEERS INDUSTRY STABILIZATION TRUST FUND; BUSINESS	
21	DEVELOPMENT TRUST FUND; and	
22	HEAVY AND HIGHWAY COMMITTEE,	
	Plaintiffs, v.	
23	R.E. SERRANO, INC., a California	
<ul><li>24</li><li>25</li></ul>	corporation, and RICKY SERRANO, individually,	
26	Defendants.	
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1	The newly substituted counsel has recently received this file and hereby respectfully		
2	requests that the Case Management Conference, currently scheduled for July 6, 2007 at 10:30		
3	a.m., be continued for approximately 60 days to allow counsel to review the case, analyze the		
4	parties' positions and any possibility of resolution, and respond as necessary.		
<ul><li>5</li><li>6</li></ul>	It is furthermore requested that all previously set deadlines and dates related to this case be		
7	continued as well.		
8	I declare under penalty of perjury that I am the attorney for the plaintiffs in the above		
9	entitled action, and that the foregoing is true of my own knowledge.		
10	Executed this 15 <sup>th</sup> day of June, 2007, at San Francisco, California.		
11	SALTZMAN & JOHNSON LAW CORPORATION		
12 13	Dv. /a/		
14	By:/s/ Muriel B. Kaplan Attorneys for Plaintiffs		
15	Attorneys for Frankrits		
16	IT IS SO ORDERED.		
17	The currently set Case Management Conference is hereby continued to		
18	September 7, 2007 at10:30 a.m		
19	Date: June 20, 2007 Mafine M. Chekey		
20	Date: _June 20, 2007 United States District Court Judge		
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