

LEWIS, BRISBOIS, BISGAARD 1 & SMITH LLP MELISSA T. OMANSKY, Esq. (SBN 227451) 221 North Figueroa Street, Suite 1200 2 Los Angeles, CA 90012 3 Omansky@lbbslaw.com E-Mail: Telephone: (213) 250-1800 4 Facsimile: (213) 2507900 5 Attorneys for Defendant

ARC PROPERTIES, INC. 6

Plaintiffs CONNIE MARTINEZ and JOSE MARTINEZ and Defendants 7 SACRAMENTO CONSOLIDATED CHARITIES dba Florin Road Bingo 8 (incorrectly sued as SCC FLORIN ROAD BINGO), KEVIN BEERS, SHAW 9 MARTINEZ and ARC PROPERTIES, INC., by and through their respective counsel, 10 hereby jointly stipulate and request, through their attorneys of record, as follows: 11 The parties have been working cooperatively to settle injunctive relief aspects 12 of this case and believe that there is a good likelihood that the parties will be able to 13 settle all issues of injunctive relief, damages, and attorneys' fees, litigation expenses 14 and costs if given more time. Specifically, and with the expectation that it will 15 expedite settlement discussions, counsel for SACRAMENTO CONSOLIDATED 16 CHARITIES dba Florin Road Bingo (incorrectly sued as SCC FLORIN ROAD 17 BINGO) desires to circulate to counsel for Plaintiffs its expert report for review prior 18 to being required to file and serve its formal Expert Witness Disclosure 19 Statement/Reports. At the same time, counsel for the respective parties are also 20 proposing to stipulate to an early settlement conference to aid in settlement of the 21 claims of Plaintiffs if the parties feel that this Court's further involvement could 22 assist in the settlement efforts. 23

24

As a result of this settlement activity, counsel for the respective parties request that the deadlines for the initial Expert Disclosure and Supplemental Expert 25 Disclosure be continued for an additional two (2) week period. 26

- /// 27
- /// 28

STIPULATION AND [PROPOSED] ORDER TO CONTINUE PRE-TRIAL DEADLINES FOR INITIAL EXPERT WITNESS DISCLOSURE REPORTS AND SUPPLEMENTAL EXPERT DISCLOSURE REPORTS

LAW OFFICES OF PAUL L. REIN 200 LAKESIDE DR., SUITE A DAKLAND, CA 94612-3503 (510) 832-5001

1	The current deadlines in this case are as follows:			
2	Expert disclosure:		March 14, 2011	
3	Supplemental expert disclosure:		e: April 12, 2011	
4	Based on the above, the parties hereby agree and stipulate to the continua		hereby agree and stipulate to the continuation	
5	of the above-noted deadlines in this case to the following:			
6	Expert disclosure:		March 28, 2011	
7	Supplemental expert disclosure:		e: April 28, 2011	
8	IT IS SO STIPULATED.			
9				
10		LAW	OFFICES OF PAUL L. REIN	
11				
12	Dated: March 9, 2011.	By	/s/ Catherine M. Cabalo CATHERINE M. CABALO, Esq.	
13			Attorneys for Plaintiffs CONNIE MARTINEZ and	
14			JOSE MARTINEZ	
15				
16		GRE	VE, CLIFFORD, WENGEL & PARAS, LLP	
17				
18				
19	Dated: March 9, 2011.	By	/s/ Scott E. Cofer SCOTT E. COFER, Esq.	
20			Attorneys for Defendants SACRAMENTO CONSOLIDATED	
21			CHARITIES dba Florin Road Bingo, KEVIN BEERS and SHAW MARTINEZ	
22				
23		LEW	IS, BRISBOIS, BISGAARD & SMITH LLP	
24				
25				
26	Dated: March 10, 2011.	By	/s/ Melissa T. Omansky MELISSA T. OMANSKY, Esq.	
27			Attorneys for Defendant ARC PROPERTIES, INC.	
28 Law offices of	STIPULATION AND [PROPOSED] ORDER TO CONTINUE PRE-TRIAL DEADLINES FOR INITIAL EXPERT WITNESS			
PAUL L. REIN 200 lakeside dr., suite a oakland, ca 94612-3503	DISCLOSURE REPORTS AND SUPPLEMENTAL : 2:10-cv-01647 GEB-GGH	EXPERT DI	-3-	

1	ORDER		
2	The Court grants the parties' stipulation, and pursuant to that stipulation		
3	continues the expert disclosure deadlines as follows:		
4	Expert disclosure: March 28, 2011		
5	Supplemental expert disclosure: April 28, 2011		
6			
7	Dated: March 10, 2011		
8	ANEDMI		
9	Jubo E. Fimelf		
10	GARLAND E. BURRELL, JR. United States District Judge		
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	STIPULATION AND [PROPOSED] ORDER TO CONTINUE PRE-TRIAL DEADLINES FOR INITIAL EXPERT WITNESS		
LAW OFFICES OF <b>PAUL L. REIN</b> 200 LAKESIDE DR., SUITE A OAKLAND, CA 94612-3503 (510) 832-5001	DISCLOSURE REPORTS AND SUPPLEMENTAL EXPERT DISCLOSURE REPORTS 2:10-cv-01647 GEB-GGH -4-		