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9 Attorneys for Plaintiffs
 10 CONNIE MARTINEZ and
 11 JOSE MARTINEZ

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19 Attorneys for Defendants
 20 SACRAMENTO CONSOLIDATED CHARITIES,
 21 dba Florin Road Bingo, incorrectly sued as
 22 SCC FLORIN ROAD BINGO; KEVIN BEERS;
 23 and SHAW MARTINEZ, incorrectly sued as SHAWN MARTINEZ

24 [Counsel for additional Defendant
 25 identified following caption]

26 UNITED STATES DISTRICT COURT
 27 EASTERN DISTRICT OF CALIFORNIA

28 CONNIE MARTINEZ and
 JOSE MARTINEZ,
 Plaintiffs,

CASE NO. 2:10-cv-01647 GEB-GGH
 GEB-GGH
Civil Rights

v.

SCC FLORIN ROAD BINGO;
 SACRAMENTO CONSOLIDATED
 CHARITIES; KEVIN BEERS;
 SHAWN MARTINEZ; ARC
 PROPERTIES, INC.; AND DOES
 1-10, INCLUSIVE,
 Defendants.

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

1 LEWIS, BRISBOIS, BISGAARD
& SMITH LLP
2 MELISSA T. OMANSKY, Esq. (SBN 227451)
221 North Figueroa Street, Suite 1200
3 Los Angeles, CA 90012
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5 Attorneys for Defendant
6 ARC PROPERTIES, INC.

7 Plaintiffs CONNIE MARTINEZ and JOSE MARTINEZ and Defendants
8 SACRAMENTO CONSOLIDATED CHARITIES dba Florin Road Bingo
9 (incorrectly sued as SCC FLORIN ROAD BINGO), KEVIN BEERS, SHAW
10 MARTINEZ and ARC PROPERTIES, INC., by and through their respective counsel,
11 hereby jointly stipulate and request, through their attorneys of record, as follows:

12 The parties have been working cooperatively to settle injunctive relief aspects
13 of this case and believe that there is a good likelihood that the parties will be able to
14 settle all issues of injunctive relief, damages, and attorneys' fees, litigation expenses
15 and costs if given more time. Specifically, and with the expectation that it will
16 expedite settlement discussions, counsel for SACRAMENTO CONSOLIDATED
17 CHARITIES dba Florin Road Bingo (incorrectly sued as SCC FLORIN ROAD
18 BINGO) desires to circulate to counsel for Plaintiffs its expert report for review prior
19 to being required to file and serve its formal Expert Witness Disclosure
20 Statement/Reports.

21 Plaintiff has indicated that it will convey a demand to Defendant Arc
22 Properties, Inc. within the next week and the parties are hopeful that a satisfactory
23 resolution can be reached as a result. On March 9, 2011, the parties stipulated to a
24 two week continuance of the deadlines for the initial Expert Disclosure and
25 Supplemental Expert Disclosure. They parties now request that, as a result of the
26 continued settlement activity, the dates be continued a second time for an additional
27 two (2) week period.

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The current deadlines in this case are as follows:

Expert disclosure: March 28, 2011

Supplemental expert disclosure: April 28, 2011

Based on the above, the parties hereby agree and stipulate to the continuation of the above-noted deadlines in this case to the following:

Expert disclosure: April 11, 2011

Supplemental expert disclosure: April 25, 2011

IT IS SO STIPULATED.

LAW OFFICES OF PAUL L. REIN

Dated: March 9, 2011.

By /s/ Catherine M. Cabalo
CATHERINE M. CABALO, Esq.
Attorneys for Plaintiffs
CONNIE MARTINEZ and
JOSE MARTINEZ

GREVE, CLIFFORD, WENGEL & PARAS, LLP

Dated: March 9, 2011.

By /s/ Scott E. Cofer
SCOTT E. COFER, Esq.
Attorneys for Defendants
SACRAMENTO CONSOLIDATED
CHARITIES dba Florin Road Bingo,
KEVIN BEERS and SHAW MARTINEZ

LEWIS, BRISBOIS, BISGAARD & SMITH LLP

Dated: March 10, 2011.

By /s/ Melissa T. Omansky
MELISSA T. OMANSKY, Esq.
Attorneys for Defendant
ARC PROPERTIES, INC.

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ORDER

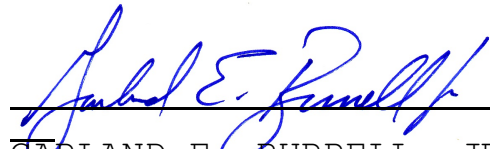
Good cause having been shown, the Court grants the parties' stipulation and request to continue deadlines in this case to the following:

Expert disclosure: April 11, 2011

Supplemental expert disclosure: April 25, 2011

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 25, 2011



GARLAND E. BURRELL, JR.
United States District Judge

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1 **FEDERAL COURT PROOF OF SERVICE**

2 Connie Martinez, et al. v. SCC Florin Road Bingo, et al. - File No. 28833-32

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 At the time of service, I was over 18 years of age and not a party to the
5 action. My business address is 221 North Figueroa Street, Suite 1200, Los
6 Angeles, California 90012. I am employed in the office of a member of the bar of
7 this Court at whose direction the service was made.

8 On March 25, 2011, I served the following document(s): SECOND
9 STIPULATION AND [PROPOSED] ORDER TO CONTINUE PRE-TRIAL
10 DEADLINES FOR INITIAL EXPERT WITNESS DISCLOSURE REPORTS
11 AND SUPPLEMENTAL EXPERT DISCLOSURE

12 I served the documents on the following persons at the following addresses
13 (including fax numbers and e-mail addresses, if applicable):

14 Attorneys for Plaintiffs CONNIE MARTINEZ and JOSE MARTINEZ:

15 PAUL L. REIN, Esq.
16 CELIA MCGUINNES, Esq.
17 CATHERINE M. CABALO
18 LAW OFFICES OF PAUL L. REIN
19 200 Lakeside Drive, Suite A
20 Oakland, CA 94612
21 E-Mail: reinlawoffice@aol.com
22 Tel: (510) 832-5001
23 Fax: (510) 832-4787

24 Attorneys for Defendants SACRAMENTO CONSOLIDATED CHARITIES, dba
25 Florin Road Bingo, incorrectly sued as SCC FLORIN ROAD BING; KEVIN
26 BEERS; and SHAW MARTINEZ, incorrectly sued as SHAWN MARTINEZ
27 GREVE, CLIFFORD, WENGEL & PARAS, LLP

28 SCOTT E. COFER, Esq.
29 2870 Gateway Oaks Drive, Suite 210
30 Sacramento, Ca 95833-4324
31 E-Mail: scottcofer@greveclifford.com
32 Tel: (916) 443-2011
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34 The documents were served by the following means:

35 [X] (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I
36 electronically filed the documents with the Clerk of the Court using the
37 CM/ECF system, which sent notification of that filing to the persons listed
38 above.

39 I declare under penalty of perjury under the laws of the United States of
40 America that the above is true and correct.

41 Executed on March 25, 2011, at Los Angeles, California.

42 _____
43 MARY ANN CAMPI