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6 Attorneys for Plaintiffs  
 CONNIE MARTINEZ and  
 7 JOSE MARTINEZ

8 *\*Defendants and their respective are counsel listed after the caption.*

9 IN THE UNITED STATES DISTRICT COURT  
 10 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

12 CONNIE MARTINEZ and  
 JOSE MARTINEZ,  
 13  
 14 Plaintiffs,

Case No. 2:10-cv-01647 GEB-GGH  
Civil Rights

14 v.

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

**STIPULATION AND ORDER  
 FOR DISMISSAL OF CLAIMS  
 AGAINST DEFENDANTS SCC  
 FLORIN ROAD BINGO,  
 SACRAMENTO  
 CONSOLIDATED CHARITIES,  
 KEVIN BEERS, AND SHAW  
 MARTINEZ WITH PREJUDICE**

21 SCOTT E. COFER, Esq.  
 GREVE, CLIFFORD, WENGEL & PARAS, LLP  
 22 2870 Gateway Oaks Drive, Suite 210  
 Sacramento, CA 95833  
 23 Telephone: 916/443-2011  
 Facsimile: 916/441-7457

24 Attorneys for Defendants  
 25 SCC FLORIN ROAD BINGO, SACRAMENTO  
 CONSOLIDATED CHARITIES, KEVIN BEERS,  
 26 AND SHAW MARTINEZ (erroneously sued as  
 SHAWN MARTINEZ)

28 STIPULATION AND PROPOSED ORDER  
 OF DISMISSAL OF ALL CLAIMS AGAINST  
 ALL REMAINING DEFENDANTS  
 Case No. 2:10-cv-01647 GEB-GGH  
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1 **STIPULATION**

2 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
3 plaintiffs CONNIE AND JOSE MARTINEZ (“Plaintiffs”) and defendants SCC  
4 FLORIN ROAD BINGO, SACRAMENTO CONSOLIDATED CHARITIES,  
5 KEVIN BEERS, and SHAW MARTINEZ (erroneously sued as SHAWN  
6 MARTINEZ) (together referred to as “Defendants”), by and through their respective  
7 attorneys of record, stipulate that:

8 1. Plaintiffs’ Complaint in the above-entitled action shall be dismissed  
9 with prejudice as against Defendants;

10 2. The Court will retain jurisdiction to enforce the Consent Decree and  
11 Order entered by the Court on August 29, 2011 (see Docket No. 48); and

12 **IT IS SO STIPULATED.**

13 Dated: November 29, 2011

LAW OFFICES OF PAUL L. REIN

14 /s/ Catherine M. Cabalo

15 By: Catherine M. Cabalo, Esq.  
16 Attorneys for Plaintiffs  
17 CONNIE AND JOSE MARTINEZ

18 Dated: November 29, 2011

GREVE, CLIFFORD, WENGEL &  
19 PARAS, LLP

20 /Scott E. Cofer/

21 By: Scott E. Cofer, Esq.  
22 Attorneys for Defendants  
23 SCC FLORIN ROAD BINGO,  
24 SACRAMENTO CONSOLIDATED  
25 CHARITIES, KEVIN BEERS, AND  
26 SHAW MARTINEZ  
(ERRONEOUSLY SUED AS  
27 SHAWN MARTINEZ)

1 **ORDER**

2 Having reviewed the above Stipulation for Dismissal of Claims against  
3 Defendants SCC FLORIN ROAD BINGO, SACRAMENTO CONSOLIDATED  
4 CHARITIES, KEVIN BEERS, and SHAW MARTINEZ (erroneously sued as  
5 SHAWN MARTINEZ) with Prejudice submitted by plaintiffs CONNIE AND JOSE  
6 MARTINEZ (“Plaintiffs”) on the one hand and Defendants SCC FLORIN ROAD  
7 BINGO, SACRAMENTO CONSOLIDATED CHARITIES, KEVIN BEERS, and  
8 SHAW MARTINEZ (erroneously sued as SHAWN MARTINEZ) on the other  
9 hand,

10 IT IS HEREBY ORDERED that:

- 11 1. Plaintiffs’ Complaint in the above-entitled action shall be dismissed  
12 with prejudice as against all remaining defendants SCC FLORIN ROAD BINGO,  
13 SACRAMENTO CONSOLIDATED CHARITIES, KEVIN BEERS, and SHAW  
14 MARTINEZ (erroneously sued as SHAWN MARTINEZ);
- 15 2. The Court will retain jurisdiction to enforce the Consent Decree and  
16 Order entered by the Court on August 29, 2011 (see Docket No. 48).
- 17 3. The Clerk shall close this case.

18  
19  
20 Dated: December 12, 2011

/s/ Gregory G. Hollows

21 \_\_\_\_\_  
22 Honorable GREGORY G. HOLLOWES  
23 United States Magistrate Judge  
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25  
26  
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