

1 McCormick, Barstow, Sheppard,  
Wayte & Carruth LLP  
2 Timothy J. Buchanan, #100409  
*tim.buchanan@mccormickbarstow.com*  
3 7647 North Fresno Street  
Fresno, California 93720  
4 Telephone: (559) 433-1300  
Facsimile: (559) 433-2300  
5

6 Attorneys for Defendants appearing specially  
7

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 RICARDO TORRES, individually and on  
11 behalf of LA FAVORITA  
BROADCASTING, INC., a suspended  
12 California corporation. LA FAVORITA  
RADIO NETWORK, INC., a suspended  
13 California corporation; KAFY, INC., a  
suspended California corporation; KBYN,  
14 INC., a suspended California corporation;  
KCFA, INC., a suspended California  
15 corporation; KSKD, INC., a suspended  
California corporation; and KNT0, INC., a  
16 suspended California corporation,

17 Plaintiff,

18 v.

19 LA FAVORITA BROADCASTING,  
INC., a suspended California corporation.;  
20 LA FAVORITA RADIO NETWORK,  
INC., a suspended California corporation;  
21 KAFY, INC., a suspended California  
corporation; KBYN, INC., a suspended  
22 California corporation; KCFA, INC., a  
suspended California corporation; KSKD,  
23 INC., a suspended California corporation;  
and KNT0, INC., a suspended California  
24 corporation; NELSON F. GOMEZ, an  
individual; DEBBIE L. GOMEZ, an  
25 individual; and DOES 1 through 10  
inclusive,  
26

27 Defendants.  
28

Case No. 17-cv-00888-LJO-SAB

**STIPULATION AND ORDER RE:  
CONTINUANCE OF SCHEDULING  
CONFERENCE**

1 Plaintiff and Defendants, and each of them, *appearing specially* through counsel (having  
2 not appeared yet in this action), stipulate as follows:

3 1. The proofs of service filed on October 16, 2017 in this action (Docs. 7, 8, 9, 10, 11,  
4 12, 13, 14, 15) are without force or effect. The complaint served as shown in those proofs of  
5 service was not effectively served.

6 2. The operative complaint in this action was later served effectively October 18,  
7 2017.

8 3. Defendants shall have until December 8, 2017, within which to respond to the  
9 complaint.

10 4. The parties request that the Court vacate the scheduling conference currently set for  
11 November 9, 2017. The parties further request that the Court reset that conference for a date on or  
12 after January 15, 2018, at the Court's availability.

13 5. This stipulation and proposed order does not constitute a general appearance in this  
14 action by any Defendant. The stipulation is entered into and presented as a special appearance  
15 solely for purposes of the relief it seeks and for no other purpose.

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: November 11, 2017

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By:                   /s/ Timothy J. Buchanan                    
                  Timothy J. Buchanan  
For Defendants, appearing specially solely for  
                  purposes of this stipulation and application

