1 2 3 4 5 6	Boris Treyzon, Esq. (SBN: 188893) David S. Bederman, Esq. (SBN: 285262) ABIR COHEN TREYZON SALO, LLI 1901 Avenue of the Stars, Suite 935 Los Angeles, California 90067 Telephone: (424) 288-4367 Facsimile: (424) 288-4368 Attorneys for Plaintiff Ricardo Torres	
7 8 9 10 11	McCormick, Barstow, Sheppard, Wayte & Carruth LLP Timothy J. Buchanan, #100409 7647 North Fresno Street Fresno, California 93720 Telephone: (559) 433-1300 Facsimile: (559) 433-2300 Attorneys for Defendants, appearing spec	ially
13 14 15		DISTRICT COURT CT OF CALIFORNIA
1617181920212223	RICARDO TORRES, individually and on behalf of LA FAVORITA BROADCASTING, INC., a suspended California corporation. LA FAVORITA RADIO NETWORK, INC., a suspended California corporation; KAFY, INC., a suspended California corporation; KBYN, INC., a suspended California corporation; KCFA, INC., a suspended California corporation; KSKD, INC., a suspended California corporation; and KNTO, INC., a suspended California corporation; and KNTO, INC., a suspended California corporation,	Case No. 17-cv-00888-LJO-SAB STIPULATION AND ORDER EXTENDING DEFENDANTS' TIME TO RESPOND TO COMPLAINT BY ONE WEEK
24	Plaintiff, v.	
252627	LA FAVORITA BROADCASTING, INC., a suspended California corporation.;	

California corporation; KBYN, INC., a suspended California corporation; KCFA, INC., a suspended California corporation; KSKD, INC., a suspended California corporation; and KNTO, INC., a suspended California corporation; NELSON F. GOMEZ, an individual; DEBBIE L. 5 GOMEZ, an individual; and DOES 1 through 10 inclusive. 6 7 Defendants. 8 9 10 11 1. 12 2. 13 14 ("ADR"); 15 16 3. 17 18 such week;

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

- 1. Defendants' deadline to file a responsive pleading in this action currently falls on December 8, 2017;
- 2. The parties are negotiating a stipulation that would stay litigation of this action so that it may be submitted to binding Alternate Dispute Resolution ("ADR");
- 3. The parties require one (1) week of additional time to negotiate the terms and procedures for ADR, and anticipate that they will reach agreement within such week;
- 4. Accordingly, Plaintiff agrees that Defendants shall have until **December 15, 2017** within which to respond to the complaint.
- 5. This stipulation and proposed order does not constitute a general appearance in this action by any Defendant. The stipulation is entered into and presented as a special appearance solely for purposes of the relief it seeks and for no other purpose.

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1	Dated: December 8, 2017	McCORMICK, BARSTOW, SHEPPARD,
2		WAYTE & CARRUTH LLP
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4		Bv:/s/ Timothy J. Buchanan
5		Timothy J. Buchanan
6		For Defendants, <u>appearing specially</u> solely for purposes of this stipulation and
7		application
8	Datady Dagambar 9, 2017	ADID COHEN TREVZON CALO LLD
9	Dated: December 8, 2017	ABIR COHEN TREYZON SALO, LLP
10		
11		By:/s/ Boris Treyzon
12		Boris Treyzon
13		David S. Bederman Attorneys for Plaintiff RICARDO TORRES
14	IT IS SO ORDERED.	
15		Just A. Lace
16 17	Dated: December 8, 2017	UNITED STATES MAGISTRATE JUDGE
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MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP 7647 NORTH FRESNO STREET FRESNO, CA 93720

1	<u>ORDER</u>
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