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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

17 RICARDO TORRES, individually and
18 on behalf of LA FAVORITA
19 BROADCASTING, INC., a suspended
20 California corporation. LA FAVORITA
21 RADIO NETWORK, INC., a
22 suspended California corporation;
23 KAFY, INC., a suspended California
24 corporation; KBYN, INC., a suspended
25 California corporation; KCFA, INC., a
26 suspended California corporation;
27 KSKD, INC., a suspended California
28 corporation; and KNTO, INC., a
suspended California corporation,

Plaintiff,

v.

LA FAVORITA BROADCASTING,
INC., a suspended California
corporation.;
LA FAVORITA RADIO NETWORK,
INC., a suspended California
corporation; KAFY, INC., a suspended

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

**STIPULATION AND ORDER
EXTENDING DEFENDANTS'
TIME TO RESPOND TO
COMPLAINT BY TWO (2) WEEKS**

Judge: Hon. Stanley A. Boone
Courtroom: 9

1 California corporation; KBYN, INC., a
2 suspended California corporation;
3 KCFA, INC., a suspended California
4 corporation; KSKD, INC., a suspended
5 California corporation;
6 and KNTD, INC., a suspended
7 California corporation; NELSON F.
8 GOMEZ, an individual; DEBBIE L.
9 GOMEZ, an individual; and DOES 1
10 through 10
11 inclusive,

12 Defendants.

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

15 1. Defendants' deadline to file a responsive pleading in this action
16 currently falls on December 15, 2017;

17 2. The parties are negotiating a stipulation that would stay litigation of
18 this action so that it may be submitted to binding Alternate Dispute Resolution
19 ("ADR");

20 3. The parties require two (2) weeks of additional time to negotiate the
21 terms and procedures for ADR, and anticipate that they will reach agreement within
22 such two weeks;

23 4. Accordingly, Plaintiff agrees that Defendants shall have until
24 **December 29, 2017** within which to respond to the complaint.

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

1 Dated: December 15, 2017

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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

Dated: December 15, 2017

ABIR COHEN TREYZON SALO, LLP

Bv: /s/ Boris Treyzon
Boris Treyzon
David S. Bederman
Attorneys for Plaintiff RICARDO TORRES

ORDER

Pursuant to the parties' stipulation, IT IS HEREBY ORDERED that
Defendants' answer to the complaint is due on or before December 29, 2017.

IT IS SO ORDERED.

Dated: December 15, 2017


UNITED STATES MAGISTRATE JUDGE