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Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS)	
Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX,)	
Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	Facility ID No. 9993
)	
Permittee of FM Station KYAF,)	
Firebaugh, California)	
)	
H. L. CHARLES d/b/a FORD CITY BROADCASTING)	Facility ID No. 22030
)	
Permittee of FM Station KZPE,)	
Ford City, California)	
)	
LINDA WARE d/b/a LINDSAY BROADCASTING)	Facility ID No. 37725
)	
Licensee of FM Station KZPO,)	
Lindsay, California)	

DOCKET FILE COPY ORIGINAL

To: Marlene H. Dortch, Secretary, FCC
Attn: Chief Administrative Law Judge
Richard L. Sippel

OBJECTION TO PROPOSED ORDER REGARDING NEGATIVE FINDINGS OF FACT WARRANTED BY DISCOVERY VIOLATIONS

The Estate of Linda Ware, Cynthia Ramage, Executor, the Estate of H.L. Charles, Robert Willing, Executor, and William

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L. Zawila hereby submit this Objection to the Enforcement Bureau's Proposed Order Regarding Negative Findings of Fact Warranted By Discovery Violations served in this matter on 3-30-16 as follows.

PRIOR REQUESTS FOR ADMISSION WERE SERVED AND PROPERLY RESPONDED TO BY THESE OBJECTING PARTIES -

Almost 13 years ago, the enforcement bureau served requests for admission in this proceeding in or about September, 2003. These objecting parties properly responded to these requests for admission on or about 10-20-03. At the time, these objecting parties were represented by Washington counsel Howard J. Braun of the firm Katten Muchin Zavis & Rosenman as well as by other attorneys from this firm. Arrangements were handled between Mr. Braun, his associates, and counsel for the enforcement bureau for these requests to be responded to in a proper manner. Such responses were prepared by these objecting parties and properly served by Mr. Braun's firm on the enforcement bureau pursuant to the arrangements made between Mr. Braun's firm and the enforcement bureau. These objecting parties were advised that the then presiding ALJ Arthur Steinberg was made aware of these responses to the said requests for admission.

The subject proposed order is inconsistent with and in conflict with the said responses to the said requests for admission that were served by Mr. Braun's firm as discussed above.

The subject proposed order appears to completely ignore the said responses served by Mr. Braun's firm which completely contradict the subject proposed order in this matter. For this reason, the proposed order should be rejected and denied.

PRIOR ORDERS OF THE PRESIDING OFFICER -

The presiding officer in this matter has issued prior orders which conflict with the subject proposed order as follows.

On 3-14-16, the presiding officer issued his order (FCC 16M-08) ordering Ford City Broadcasting (the Estate of H.L. Charles) to revisit and respond to discovery, including the requests for admission served by the enforcement bureau. This order contained no deadline date for compliance. It should be noted that the Estate of H.L. Charles has now responded to the subject requests for admission in this matter and a copy was sent to the presiding officer.

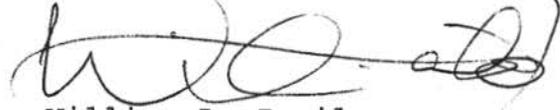
On 3-15-16, an order similar to the one described above with respect to the Estate of H.L. Charles was also issued with respect to Lindsay Broadcasting (the Estate of Linda Ware). Here too, there was no deadline date to respond to the subject requests for admission but they have in fact now been responded to by the Estate of Linda Ware with a copy to the presiding officer. This to Lindsay Broadcasting is (FCC 16M-09).

Orders similar to the ones described above were also issued by the presiding officer as to William L. Zawila. As with the other parties noted above, the subject requests for admission to William L. Zawila have now been responded to with a copy to the presiding officer.

These objecting parties are in compliance with the orders of the presiding officer described above affecting the subject requests for admission. The subject responses to the said requests for admission also conflict with and contradict the proposed order.

For the reasons discussed above, it is respectfully submitted that the proposed order in this matter should be rejected and denied inasmuch as the said responses to the two sets of requests for admission discussed above clearly provide a proper basis to deny the subject proposed order.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'W. L. Zawila', written in black ink.

William L. Zawila
Attorney for the Estate of
Linda Ware, Cynthia Ramage,
Executor, the Estate of H.L.
Charles, Robert Willing, Executor,
and William L. Zawila
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4-7-16

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Objection to Proposed Order Regarding Negative Findings of Fact Warranted By Discovery Violations was served on the following by U.S. First Class Mail, postage prepaid, on 4-7-16:

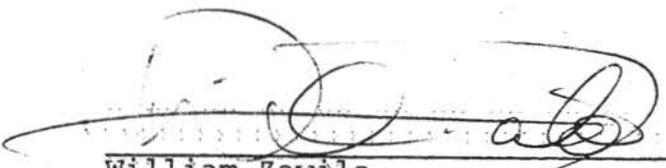
Chief Administrative Law Judge
Richard L. Sippel
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William Zawila