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8 Attorneys for Defendants
Freedom Financial Network, LLC, Freedom Debt
9 Relief, Inc. and Freedom Debt Relief, LLC

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 HAIDEE ESTRELLA, an individual, and
ANGELICA ARITA, an individual, on behalf
15 of themselves and all others similarly situated,
and on behalf of the general public,

16 Plaintiffs,

17 v.

18 FREEDOM FINANCIAL NETWORK, LLC,
19 et al.,

20 Defendants.
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Case No. CV-09-03156 SI

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

STIPULATION AND [PROPOSED] ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE

CASE NO. CV-09-03156 SI

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

1 **WHEREAS**, a Case Management Conference is currently scheduled for May 7, 2010 in
2 the above-captioned matter;

3 **WHEREAS**, Plaintiffs' motion for class certification was argued on April 9, 2010 and is
4 currently pending before the Court;

5 **WHEREAS**, the parties agree that the nature and scope of the matters to be discussed at
6 the upcoming Case Management Conference will be informed by the pending decision regarding
7 class certification; and

8 **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial
9 economy and efficiency to continue the existing May 7, 2010 Case Management Conference to
10 allow additional time for the Court to rule on Plaintiffs' motion for class certification and,
11 thereafter, to allow the parties sufficient time to meet and confer regarding the submission of a
12 Joint Case Management Statement following the decision on class certification;

13 **IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 7-12, by and between
14 the undersigned counsel for the Parties that:

15 1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for May
16 7, 2010 be vacated and rescheduled for June 4, 2010, or such other time as the Court shall
17 determine to be appropriate; and

18 2. The associated Joint Case Management Statement deadline likewise be deferred to
19 May 28, 2010.

20 Dated: April 26, 2010

CLARK & MARKHAM LLP
LAW OFFICES OF BARRON E. RAMOS
KERSHAW, CUTTER, & RATINOFF LLP
CHARLES E. AMES, P.C.
THE CROSLY LAW FIRM, P.C.
WEXLER WALLACE LLP

21 By: 
22 Attorney

23 Attorneys for Plaintiffs HAIDEE ESTRELLA and
24 ANGELICA ARITA
25
26
27
28

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

1 Dated: April 27, 2010

FENWICK & WEST LLP

2
3 By: 

Kevin P. Muck

4 Attorneys for Defendants

5 FREEDOM FINANCIAL NETWORK, LLC,
6 FREEDOM DEBT RELIEF, INC. and FREEDOM
DEBT RELIEF, LLC

7 Dated: April 27, 2010

LAW OFFICES OF ALLEN RUBY

8
9 By: 

Allen Ruby

10 Attorneys for Defendants

11 BRADFORD STROH and ANDREW HOUSSEY

12 Dated: April __, 2010

GREENSPOON MARDER, P.A.

13
14 By: _____

Richard W. Epstein

15 Attorneys for Defendants GLOBAL CLIENT
16 SOLUTIONS, LLC & ROCKY MOUNTAIN
17 BANK & TRUST
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1 Dated: April __, 2010

FENWICK & WEST LLP

2
3 By: _____

Kevin P. Muck

4 Attorneys for Defendants

5 FREEDOM FINANCIAL NETWORK, LLC,
6 FREEDOM DEBT RELIEF, INC. and FREEDOM
DEBT RELIEF, LLC

7 Dated: April __, 2010

LAW OFFICES OF ALLEN RUBY

8
9 By: _____

Allen Ruby

10 Attorneys for Defendants

11 BRADFORD STROH and ANDREW HOUSSER

12 Dated: April 22, 2010

GREENSPOON MARDER, P.A.

13
14 (w By: _____

Richard W. Epstein

15 Attorneys for Defendants GLOBAL CLIENT
16 SOLUTIONS, LLC & ROCKY MOUNTAIN
17 BANK & TRUST

Fla. Bar N
062198


FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

[PROPOSED] ORDER

IT IS HEREBY ORDERED THAT:

1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for May 7, 2010 is vacated and rescheduled for June 4, 2010;
2. The associated Joint Case Management Statement deadline shall be May 28, 2010.

Dated: 9/27/10


Hon. Susan Illston
United States District Court Judge

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

PROOF OF SERVICE

The undersigned certifies and declares as follows:

I am a citizen of the United States and employed in San Francisco County, State of California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Fenwick & West LLP, 555 California Street, 12th Floor, San Francisco, California 94104. On the date set forth below, I served a copy of the following document(s):

- **STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE**

on the interested parties in the subject actions by placing a true copy thereof as indicated below, addressed as follows:

☒ **BY ECF:** electronic service pursuant to General Order No. 45 and Local Rule 5-4. I hereby certify that the above documents were uploaded to the ECF Website and the ECF Webmaster will give email notification to all registered parties.

I declare under penalty of perjury under the laws of the State of California and the United States that the above is true and correct.

Dated: April 27, 2010

By: /s/ Jennifer C. Bretan
Jennifer C. Bretan

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO