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

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

FENWICK & WEST LLP
 ATTORNEYS AT LAW
 SAN FRANCISCO

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.

Case No. CV-09-03156 SI
**STIPULATION AND [PROPOSED]
 ORDER CONTINUING CASE
 MANAGEMENT CONFERENCE**

1 **WHEREAS**, on June 2, 2010, in conjunction with the Court’s Order on class
2 certification, the Court continued the Case Management Conference scheduled for June 3, 2010 in
3 the above-captioned matter to June 25, 2010;

4 **WHEREAS**, consistent with the April 30, 2010 letter previously filed with the Court, the
5 June 25, 2010 date continues to present a conflict for counsel for defendants Freedom Debt
6 Relief, LLC, Freedom Debt Relief, Inc., and Freedom Financial Network (collectively, the
7 “Freedom Defendants”);

8 **WHEREAS**, the parties have conferred and determined that the first date on which all
9 counsel are available, in light of the aforementioned conflict and pending trial schedules, appears
10 to be the afternoon of August 6, 2010;

11 **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial
12 economy and efficiency to continue the June 25, 2010 Case Management Conference to August
13 6, 2010, a date which will allow the parties sufficient time to meet and confer regarding the
14 submission of a Joint Case Management Statement following the Court’s decision on class
15 certification and to agree on a form of notice to absent class members;

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

18 1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for June
19 25, 2010 be vacated and rescheduled to August 6, 2010 at 3:00 p.m., or such other time as the
20 Court shall determine to be appropriate; and

21 2. The associated Joint Case Management Statement deadline likewise be deferred to
22 July 30, 2010; and

23 3. The parties shall meet and confer concerning the manner, form and content of
24 notice to be provided to absent class members and submit a proposal concerning same to the
25 Court in writing by July 30, 2010.

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1 Dated: June 7, 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

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6 By: /s/ Stuart C. Talley
Stuart C. Talley

7 Attorneys for Plaintiffs HAIDEE ESTRELLA and
8 ANGELICA ARITA

9 Dated: June 7, 2010

FENWICK & WEST LLP

10 By: /s/ Kevin P. Muck
11 Kevin P. Muck

12 Attorneys for Defendants
13 FREEDOM FINANCIAL NETWORK, LLC,
14 FREEDOM DEBT RELIEF, INC. and FREEDOM
DEBT RELIEF, LLC

15 Dated: June 7, 2010

LAW OFFICES OF ALLEN RUBY

16 By: /s/ Allen Ruby
17 Allen Ruby

18 Attorneys for Defendants
19 BRADFORD STROH and ANDREW HOUSSER

20 Dated: June 7, 2010

GREENSPOON MARDER, P.A.

21 By: /s/ Richard W. Epstein
22 Richard W. Epstein

23 Attorneys for Defendants GLOBAL CLIENT
24 SOLUTIONS, LLC & ROCKY MOUNTAIN
BANK & TRUST

25 Pursuant to General Order No. 45 Section X(B), all of the signatories concur in the filing of this
26 stipulation.

27 Dated: June 7, 2010

FENWICK & WEST LLP

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

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[PROPOSED] ORDER

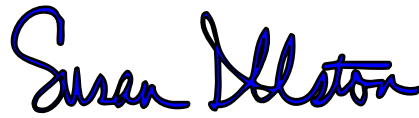
IT IS HEREBY ORDERED THAT:

1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for June 25, 2010 be vacated and rescheduled to August 6, 2010 at 3:00 p.m., or such other time as the Court shall determine to be appropriate; and

2. The associated Joint Case Management Statement deadline likewise be deferred to July 30, 2010; and

3. The parties shall meet and confer concerning the manner, form and content of notice to be provided to absent class members and submit a proposal concerning same to the Court by July 30, 2010.

Dated: _____



Hon. Susan Illston
United States District Court Judge

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