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8 Attorneys for Plaintiffs and the Class

9 [Additional Counsel Listed on Signature Page]

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12	HAIDEE ESTRELLA, an individual,	) Case No. 09-03156 SI
13	and ANGELICA ARITA, an individual, on behalf	)
14	of themselves and all others similarly situated, and	) <b>STIPULATION AND [PROPOSED]</b>
15	on behalf of the general public,	) <b>ORDER TO AMEND CLASS</b>
16		) <b>DEFINITION</b>
17	Plaintiffs,	)
18		)
19	v.	)
20		)
21	FREEDOM FINANCIAL NETWORK, LLC, a	)
22	Delaware limited liability company; FREEDOM	)
23	DEBT RELIEF, INC., a California corporation;	)
24	FREEDOM DEBT RELIEF, LLC, a Delaware	)
25	limited liability company; GLOBAL CLIENT	)
26	SOLUTIONS, LLC; ROCKY MOUNTAIN	)
27	BANK AND TRUST; ANDREW HOUSSER; and	)
28	BRADFORD STROH and DOES 1 through 100,	)
		)
	Defendants.	)
		)

WHEREAS, on June 2, 2010, the Court granted plaintiffs’ Motion for Class Certification certifying a class defined as:

“All consumers nationwide who paid FDR for debt reduction services during the four years preceding filing of the complaint, who opened an SPA with RMBT and GCS, and who did not receive a full refund of fees from FDR. The class will exclude all defendants and all agents, attorneys, and employees of defendants; all members of the California judiciary sitting in judgment on this case; and plaintiffs’ attorneys and their employees; and, all other persons within three degrees of consanguinity of the named defendants, attorneys, employees and judges.”

1 WHEREAS, on March 26, 2010 in a related proceeding pending in the Eastern District of  
2 Washington entitled *Carlsen v. Freedom Debt Relief, LLC et al.* Case No. 2:09-cv-0055-LRS, a  
3 court certified a class consisting of residents of the State of Washington who executed a Debt  
4 Reduction Agreement with Freedom Debt Relief, LLC and/or Freedom Financial Network, LLC;  
5 and

6 WHEREAS, as a result of the *Carlsen* class certification decision, plaintiffs' motion for  
7 Class Certification in this action expressly excluded residents of the State of Washington from the  
8 proposed class;

9 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES THAT the definition  
10 of the class certified by the court be amended as follows:

11 "All consumers nationwide who paid FDR for debt reduction services during the  
12 four years preceding filing of the complaint, who opened an SPA with RMBT and  
13 GCS, and who did not receive a full refund of fees from FDR. Residents of the State  
14 of Washington are excluded from the class. The class will also exclude all  
15 defendants and all agents, attorneys, and employees of defendants; all members of  
the California judiciary sitting in judgment on this case; and plaintiffs' attorneys and  
their employees; and, all other persons within three degrees of consanguinity of the  
named defendants, attorneys, employees and judges."

16 Dated: October 25, 2010.

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**Attorneys for Defendants Freedom Financial  
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Freedom Debt Relief, LLC**

22 Dated: October 25, 2010.

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**Attorneys for Defendants Andrew Houser and  
Bradford Stroh**

1 Dated: October 25, 2010.

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8 **Attorneys for Defendants Global Client Solutions,**  
9 **LLC & Rocky Mountain Bank and Trust**

10 Dated: October 25, 2010.

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**Attorneys For The Plaintiffs**

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

Dated: October 25, 2010

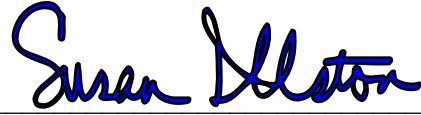
          /s/ Stuart C. Talley            
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[PROPOSED] ORDER

**IT IS HEREBY ORDERED.**

Dated: \_\_\_\_\_



\_\_\_\_\_  
Hon. Susan Illston  
U.S. DISTRICT COURT JUDGE