

1 ROBERT S. BOULTER (SBN 153549)  
 2 [rsb@lb-attorneys.com](mailto:rsb@lb-attorneys.com)  
 3 PETER C. LAGARIAS (SBN 77091)  
 4 [rsb@lb-attorneys.com](mailto:rsb@lb-attorneys.com)  
 5 LAGARIAS & BOULTER, LLP  
 1629 Fifth Avenue  
 San Rafael, California 94901-1828  
 Telephone: 415.460.0100  
 Facsimile: 415.460.1099

6 RICHARD W. EPSTEIN (Fla. Bar No. 229091)  
 7 [Richard.Epstein@gmlaw.com](mailto:Richard.Epstein@gmlaw.com)  
 HAAS A. HATIC (Fla. Bar No. 843989)  
 8 [Haas.Hatic@gmlaw.com](mailto:Haas.Hatic@gmlaw.com)  
 REBECCA F. BRATTER (Fla. Bar No. 0685100)  
 9 [Rebecca.Bratter@gmlaw.com](mailto:Rebecca.Bratter@gmlaw.com)  
 GREENSPOON MARDER, P.A.  
 Trade Centre South, Suite 700  
 10 100 W. Cypress Creek Road  
 Ft. Lauderdale, FL 33309  
 11 954.491.1120  
 954.343.6958 (facsimile)

12 Attorneys for Defendants  
 13 Global Client Solutions, LLC and  
 Rocky Mountain Bank and Trust

14  
 15 UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

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

19 Plaintiffs,

20 v.

21 FREEDOM FINANCIAL NETWORK, LLC a  
 Delaware limited liability company; FREEDOM  
 22 DEBT RELIEF, INC., a California corporation;  
 FREEDOM DEBT RELIEF, LLC, a Delaware  
 23 limited liability company; GLOBAL CLIENT  
 SOLUTIONS, LLC; ROCKY MOUNTAIN  
 24 BANK AND TRUST; ANDREW HOUSSER;  
 AND BRADFORD STROH and DOES 1  
 25 through 100,

26 Defendants.



Case No. CV-09-03156 SI

**JOINT MOTION TO; (1) SUSPEND  
 THE DISPOSITIVE MOTION  
 DEADLINE; (2) SUSPEND THE  
 SCHEDULE; AND (3) EXCUSE  
 DEFENDANTS GLOBAL CLIENT  
 SOLUTIONS, LLC AND ROCKY  
 MOUNTAIN BANK AND TRUST  
 FROM THE FEBRUARY 25, 2011  
 CASE MANAGEMENT  
 CONFERENCE**

Judge: The Honorable Susan Illston

1 Plaintiffs Haidee Estrella and Angelica Arita (collectively, "Plaintiffs") and Defendants  
2 Global Client Solutions, LLC ("Global") and Rocky Mountain Bank and Trust ("RMBT")  
3 (collectively, "Defendants," and collectively with Plaintiffs, the "Parties") have met and  
4 conferred through their respective counsel and hereby submit this joint Motion to; (1) Suspend  
5 the Dispositive Motion Deadline as to Global and RMBT; (2) Suspend the Schedule of this case  
6 as to Defendants Global and RMBT; and (3) Excuse Global and RMBT from the currently  
7 schedule case management conference set for February 25, 2011, inasmuch as these parties have  
8 reached a settlement of the claims asserted by Plaintiffs in this matter.

9 1. On January 13, 2011 the Parties held a settlement conference before Magistrate  
10 Judge Spero during which Plaintiffs and Global and RMBT reached a settlement as to all matters  
11 raised herein;

12  
13 2. The Parties are currently documenting the settlement and, therefore, request that  
14 pending the ultimate approval by this Court of the settlement agreement and the terms contained  
15 therein, and in the interest of saving the time and money of this Court and that of the Parties, that  
16 this Court, as to Global and RMBT;

17  
18 a. Suspend the Dispositive Motion deadline currently set for January 21,  
19 2011;

20  
21 b. Excuse Global and RMBT from the case management conference  
22 scheduled for February 25, 2011; and

23  
24 c. Suspend all further deadlines.

25  
26 3. This application does not affect the current motion and briefing schedule in effect  
27 between plaintiffs and defendants other than Global and RMBT.  
28

