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

16 Plaintiffs,

17 v.

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

23 Defendants.

Case No. CV-09-03156 SI

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

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

1           **WHEREAS**, on January 21, 2011, Plaintiffs Haidee Estrella and Angelica Arita  
2 (“Plaintiffs”) and Defendants Freedom Debt Relief, LLC, Freedom Debt Relief, Inc., Freedom  
3 Financial Network, LLC, Andrew Houser and Brad Stroh (collectively, the “Freedom  
4 Defendants”) each moved for partial summary judgment and/or summary adjudication with  
5 respect to a central claim in this matter (“the Motions”);

6           **WHEREAS**, the hearing on the Motions is scheduled for February 25, 2011 at 9:00 a.m;

7           **WHEREAS**, the Plaintiffs and the Freedom Defendants have also agreed to a further  
8 settlement conference with the Magistrate Judge Joseph C. Spero set for April 27, 2011;

9           **WHEREAS**, Plaintiffs and Defendants Rocky Mountain Bank & Trust and Global Client  
10 Solutions have entered into a tentative settlement agreement with the Class and are still in the  
11 process of putting together the proposed agreement for submission to the Court;

12           **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial  
13 economy and efficiency to continue the February 25, 2011 Case Management Conference to  
14 May 6, 2011, a date which will provide time for the Court to render its decision on the Motions  
15 and for Plaintiffs and the Freedom Defendants to have participated in the further settlement  
16 conference;

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

19           1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for  
20 February 25, 2011 be vacated and rescheduled to May 6, 2011 at 3:00 p.m., or such other time as  
21 the Court shall determine to be appropriate; and

22           2. The associated Joint Case Management Statement deadline shall likewise be  
23 deferred for submission consistent with Civil L.R. 16-10(d).

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FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

1 Dated: February 16, 2011

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

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

Attorneys for Plaintiffs HAIDEE ESTRELLA and  
ANGELICA ARITA

8 Dated: February 16, 2011

FENWICK & WEST LLP

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

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

14 Dated: February 16, 2011

LAW OFFICES OF ALLEN RUBY

By: /s/ Allen Ruby  
Allen Ruby

Attorneys for Defendants  
BRADFORD STROH and ANDREW HOUSSER

19 Dated: February 16, 2011

GREENSPOON MARDER, P.A.

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

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

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

25 Dated: February 17, 2011

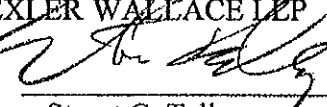
FENWICK & WEST LLP

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

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Dated: February 16, 2011

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

By:   
Stuart C. Talley

Attorneys for Plaintiffs HAIDEE ESTRELLA and  
ANGELICA ARITA

Dated: February 16, 2011

FENWICK & WEST LLP

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

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

Dated: February 16, 2011

LAW OFFICES OF ALLEN RUBY

By: /s/ Allen Ruby  
Allen Ruby

Attorneys for Defendants  
BRADFORD STROH and ANDREW HOUSSER

Dated: February 15, 2011

GREENSPOON MARDER P.A.

By:   
Richard W. Epstein

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

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

Dated: February 16, 2011

FENWICK & WEST LLP

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

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

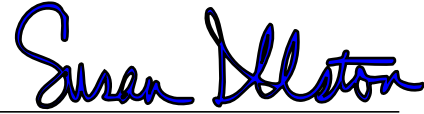
**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for February 25, 2011 be vacated and rescheduled to May 6, 2011 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 shall likewise be deferred for submission consistent with Civil L.R. 16-10(d).

Dated: 2/22/11



Hon. Susan Illston  
United States District Court Judge

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

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