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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 MODIFYING CERTAIN
 DISCOVERY DEADLINES UNDER
 PRETRIAL PREPARATION ORDER**

1 **WHEREAS**, on October 27, 2010, the Court issued a Pretrial Preparation Order setting
2 certain deadlines related to non-expert and expert discovery, and attached hereto as Exhibit A;

3 **WHEREAS**, pursuant to that Order, the non-expert discovery cutoff was set for April 30,
4 2011;

5 **WHEREAS**, the schedules of the parties and certain trial schedules of their counsel have
6 rendered it highly difficult to complete non-expert discovery within the allotted time;

7 **WHEREAS**, the parties respectfully submit that it is therefore in the interest of the parties
8 to modify the cutoff and designation dates related to non-expert and expert discovery by seven
9 calendar days in order to accommodate the schedules of the parties and their counsel;

10 **IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 6-1(b), 6-2(a), and 7-12
11 by and between the undersigned counsel for the Parties that:

12 1. Pursuant to Civil L.R. 6-2(a), the cutoff and designation dates related to non-expert
13 and expert discovery, set per the Court's Pretrial Preparation Order of October 27, 2010, be
14 modified as follows:

- 15 (a) **Non-Expert Discovery Cutoff** will move from April 30, 2011 to **May 7, 2011**;
- 16 (b) **Plaintiffs' Designation of Experts** will move from May 6, 2011 to **May 13, 2011**;
- 17 (c) **Defendants' Designation of Experts** will move from May 27, 2011 to **June 3, 2011**;
- 18 (d) **Plaintiffs' Expert Rebuttal** will move from June 13, 2001 to **June 20, 2011**;
- 19 (e) **Expert Discovery Cutoff** will move from June 30, 2011 to **July 7, 2011**.

20 2. All other dates set pursuant to the Court's Pretrial Preparation Order of October
21 27, 2010 shall remain in place.

22 Dated: March 17, 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

26 By: /s/
Stuart C. Talley

27 Attorneys for Plaintiffs HAIDEE ESTRELLA and
28 ANGELICA ARITA

1 Dated: March 17, 2011

FENWICK & WEST LLP

2

By: /s/
Kevin P. Muck

3

4

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

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6

7 Dated: March 17, 2011

LAW OFFICES OF ALLEN RUBY

8

By: /s/
Allen Ruby

9

10

Attorneys for Defendants
BRADFORD STROH and ANDREW HOUSSER

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12

13 Dated: March 17, 2011

GREENSPOON MARDER, P.A.

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By: /s/
Richard W. Epstein

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16

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

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

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21 Dated: March 17, 2011

FENWICK & WEST LLP

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

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Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

1
2 HAIDEE ESTRELLA,
3 Plaintiff,

No. C 09-03156 SI

PRETRIAL PREPARATION ORDER

4 v.

5 FREEDOM FINANCIAL,
6 Defendant.
_____ /

7
8 It is hereby **ORDERED** pursuant to F.R.C.P. and the Local Rules of this Court:

9 FURTHER CASE MANAGEMENT: February 25, 2011 at 3:00 p.m.
Counsel **must** file a joint case management statement seven days in advance of the conference.

10 Case continued to 2/25/11 @ 9:00 a.m. for Cross Motions for Summary Adjudication
11 (file 1/21/11, opposition 2/4/11, reply 2/11/11)

12 DISCOVERY PLAN: Per F.R.Civ.P and Local Rules, subject to any provisions below.

13 NON-EXPERT DISCOVERY CUTOFF is April 30, 2011.

14 DESIGNATION OF EXPERTS: pltf. 5/6/11, def. 5/27/11; REBUTTAL: 6/13/11.
Parties **SHALL** conform to Rule 26(a)(2).

15 EXPERT DISCOVERY CUTOFF is June 30, 2011.

16 DISPOSITIVE MOTIONS **SHALL** be filed by July 22, 2011;

17 Opp. Due August 5, 2011; Reply Due August 12, 2011;

18 and set for hearing no later than August 26, 2011 at 9:00 AM.

19 PRETRIAL CONFERENCE DATE: September 27, 2011 at 3:30 PM.

20 JURY TRIAL DATE: October 11, 2011 at 8:30 AM,
21 Courtroom 10, 19th floor.

22 TRIAL LENGTH is estimated to be __ days.

23 SPECIAL DISCOVERY AND PRETRIAL PROVISIONS:

24 This case shall be referred to Magistrate Judge Spero for settlement purposes. The settlement
conference shall occur between February 7 through the 18th, 2011.

25 The pretrial conference **SHALL** be attended by trial counsel prepared to discuss all aspects of the case,
26 including settlement. Parties **SHALL** conform to the attached instructions. Plaintiff is **ORDERED** to
serve a copy of this order on any party subsequently joined in this action.



27 Dated:

28 SUSAN ILLSTON
United States District Judge

United States District Court
For the Northern District of California

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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Pursuant to Civil L.R. 6-2(b), the cutoff and designation dates related to non-expert and expert discovery, set per the Court's Pretrial Preparation Order of October 27, 2010, shall be modified as follows:

- (a) **Non-Expert Discovery Cutoff is May 7, 2011;**
- (b) **Plaintiffs' Designation of Experts is May 13, 2011;**
- (c) **Defendants' Designation of Experts is June 3, 2011;**
- (d) **Plaintiffs' Expert Rebuttal is June 20, 2011;**
- (e) **Expert Discovery Cutoff is July 7, 2011.**

2. All other dates set pursuant to the Court's Pretrial Preparation Order of October 27, 2010 shall remain in place.

Dated: 3/18/11



Hon. Susan Illston
United States District Court Judge

25455/00403/SF/5332433.2