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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
 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**

1 **WHEREAS**, Plaintiffs Haidee Estrella and Angelica Arita (“Plaintiffs”) and Defendants
2 Freedom Debt Relief, LLC, Freedom Debt Relief, Inc., Freedom Financial Network, LLC,
3 Andrew Houser and Brad Stroh (collectively, the “Freedom Defendants”) have agreed to a
4 further settlement conference with Magistrate Judge Joseph C. Spero set for April 27, 2011;

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

8 **WHEREAS**, the parties previously stipulated to an order continuing the original February
9 25, 2011 Case Management Conference to May 6, 2011, in order to provide time for the Court to
10 render its decision on the parties’ cross motions for summary judgment;

11 **WHEREAS**, on March 14, 2011, the Court issued an order denying the parties’ cross-
12 motions;

13 **WHEREAS**, counsel for certain defendants now has a scheduling conflict on May 6,
14 2011;

15 **WHEREAS**, the parties are in the process of completing fact discovery, which closes
16 May 7, 2011, followed by expert discovery, which closes July 7, 2011;

17 **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial
18 economy and efficiency to continue the May 6, 2011 Case Management Conference to
19 July 15, 2011, at which time the parties expect to have completed discovery in this matter;

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

22 1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for May
23 6, 2011 be vacated and rescheduled to July 15, 2011 at 3:00 p.m., or such other time as the Court
24 shall determine to be appropriate; and

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

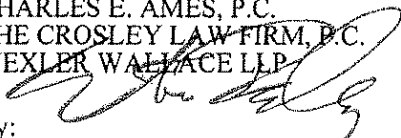
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28 ///

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

1 Dated: April 26, 2011

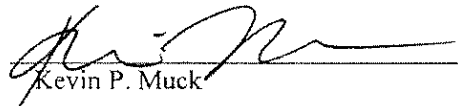
KERSHAW, CUTTER, & RATINOFF LLP
CLARK & MARKHAM LLP
LAW OFFICES OF BARRON E. RAMOS
CHARLES E. AMES, P.C.
THE CROSLY LAW FIRM, P.C.
WEXLER WALLACE LLP

2
3
4
5 By: 
Stuart C. Talley

6 Attorneys for Plaintiffs HALDEE ESTRELLA and
7 ANGELICA ARITA

8 Dated: April 26, 2011

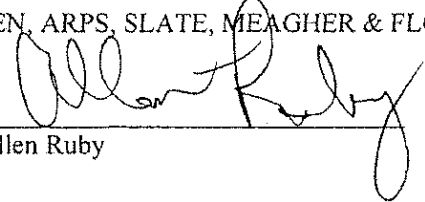
FENWICK & WEST LLP

9
10 By: 
Kevin P. Muck

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

14 Dated: April 26, 2011

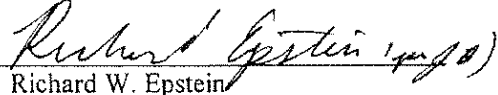
SKADDEN, ARPS, SLATE, MEAGHER & FLOM,
LLP

15
16 By: 
Allen Ruby

17 Attorneys for Defendants
18 BRADFORD STROH and ANDREW HOUSSER

19 Dated: April 26, 2011

GREENSPOON MARDER, P.A.

20
21 By: 
Richard W. Epstein

22 Attorneys for Defendants GLOBAL CLIENT
23 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
25 stipulation.

26 Dated: April 26, 2011

FENWICK & WEST LLP

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


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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for May 6, 2011 be vacated and rescheduled to July 15, 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: 5/2/11



Hon. Susan Illston
United States District Court Judge

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ATTORNEYS AT LAW
SAN FRANCISCO