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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
 EXPERT DISCOVERY DEADLINES**

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Dated: June 17, 2011

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/

Allen Ruby

Attorneys for Defendants

BRADFORD STROH and ANDREW HOUSSER

Dated: June 17, 2011

GREENSPOON MARDER, P.A.

By: /s/

Richard W. Epstein

Attorneys for Defendants GLOBAL CLIENT

SOLUTIONS, LLC and 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: June 17, 2011

FENWICK & WEST LLP

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. 6-2(b), the cutoff and designation dates related to certain expert discovery, set per the Court's Order of May 4, 2011, shall be modified as follows:

- (a) The deadline for **Defendants' Designation of Experts** is **June 27, 2011**;
- (b) The deadline for **Plaintiffs' Expert Rebuttal** is **July 14, 2011**;
- (c) **Expert Discovery Cutoff** is **August 1, 2011**.

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

Dated: 6/21/11



Hon. Susan Illston
United States District Court Judge

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

Exhibit A

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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 expert discovery, set per the Court’s Order of March 18, 2011, shall be modified as follows:

- (a) **Plaintiffs’ Designation of Experts is May 23, 2011;**
- (b) **Defendants’ Designation of Experts is June 13, 2011;**
- (c) **Plaintiffs’ Expert Rebuttal is June 30, 2011;**
- (d) **Expert Discovery Cutoff is July 18, 2011.**

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

Dated: 5/4/11



Hon. Susan Illston
United States District Court Judge

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