Fenwick & West LLP Attorneys At Law San Francisco

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9	Relief, Inc. and Freedom Debt Relief, LLC		
10			
11	UNITED STATES	DISTRICT COURT	
12	NORTHERN DISTRI	CT OF CALIFORNIA	
12	SAN FRANCISCO DIVISION		
	HAIDEE ESTRELLA, an individual, and	Case No. CV-09-03156 SI	
14	ANGELICA ARITA, an individual, on behalf		
15	of themselves and all others similarly situated, and on behalf of the general public,	STIPULATION AND [P <del>ROPOSE</del> D] ORDER MODIFYING CERTAIN	
16	Plaintiffs,	EXPERT DISCOVERY DEADLINES	
17	V.		
18	FREEDOM FINANCIAL NETWORK, LLC a		
19	Delaware limited liability company; FREEDOM DEBT RELIEF, INC., a California		
20	corporation; FREEDOM DEBT RELIEF, LLC, a Delaware limited liability company;		
21	GLOBAL CLIENT SOLUTIONS, LLC;		
22	ROCKY MOUNTAIN BANK AND TRUST; ANDREW HOUSSER; AND BRADFORD		
23	STROH and DOES 1 through 100,		
23	Defendants.		
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	STIPULATION AND [PROPOSED] ORDER MODIFYING CERTAIN EXPERT DISCOVERY DEADLINES	CASE NO. CV-09-03156 SI	

1	WHEREAS, on May 4, 2011, the Court issued an order setting certain deadlines related		
2	to expert discovery, a copy of which is attached hereto as Exhibit A;		
3	WHEREAS, the parties subsequently, by letter agreement, agreed to extend the deadline		
4	for plaintiffs' expert designations to M	for plaintiffs' expert designations to May 31, 2011;	
5	WHEREAS, in light of sched	uling issues, the parties have agre	ed to further modify the
6	cutoff and designation dates related to certain remaining expert discovery;		
7	WHEREAS, such modifications will not affect any other dates set by the Court;		
8	IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(b), 6-2(a), and 7-12		R. 6-1(b), 6-2(a), and 7-12
9	by and between the undersigned counsel for the Parties that:		
10	1. Pursuant to Civil L.R.	6-2(a), the cutoff and designation	dates related to certain
11	expert discovery, set per the Court's C	Order of May 5, 2011, be further r	nodified as follows:
12	(a) <b>Defendants' Desig</b>	gnation of Experts will move to a	June 27, 2011;
13	(c) Plaintiffs' Expert Rebuttal will move to July 14, 2011;		2011;
14	(d) Expert Discovery	Cutoff will move to August 1, 2	011.
15	2. All other dates set purs	suant to the Court's Pretrial Prepa	ration Order of October
16	27, 2010 shall remain in place.		
17		KERSHAW, CUTTER, & RATIN	NOFF LLP
18	]	CLARK & MARKHAM LLP LAW OFFICES OF BARRON E.	RAMOS
19	, r	CHARLES E. AMES, P.C. THE CROSLEY LAW FIRM, P.( WEXLER WALLACE LLP	С.
20			
21		By: <u>/s/</u> Stuart C. Talley	
22		Attorneys for Plaintiffs HAIDEE	ESTRELLA and
23		ANGELICA ARITA	
24	Dated: June 17, 2011	FENWICK & WEST LLP	
25	]	By: <u>/s/</u> Kevin P. Muck	
26		Kevin P. Muck Attorneys for Defendants FREED	OM FINANCIAL
27	]	NETWÓRK, LLC, FREEDOM D FREEDOM DEBT RELIEF, LLC	EBT RELIEF, INC. and
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	STIPULATION AND [PROPOSED] ORDER MODIFYING CERTAIN EXPERT DISCOVERY DEADLINES	1	CASE NO. CV-09-03156 SI

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1	Dated: June 17, 2011	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
2		By: <u>/s/</u>
3		Allen Ruby
4		Attorneys for Defendants BRADFORD STROH and ANDREW HOUSSER
5	Dated: June 17, 2011	GREENSPOON MARDER, P.A.
6		By: <u>/s/</u>
7		Richard W. Epstein
8		Attorneys for Defendants GLOBAL CLIENT SOLUTIONS, LLC and ROCKY MOUNTAIN BANK &
9		TRUST
10	Pursuant to General Order No. 45 Section X(B), all of the signatories concur in the filing of this stipulation.	
11	Suparation	
12	Dated: June 17, 2011	FENWICK & WEST LLP
13		By: /s/ Jennifer C. Bretan
14		Jennifer C. Bretan
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	STIPULATION AND [PROPOSED] ORD MODIFYING CERTAIN EXPERT DISCOVERY DEADLINES	ER 2 CASE NO. CV-09-03156 SI

Fenwick & West LLP Attorneys at Law San Francisco

1	[PROPOSED] ORDER	
2	PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:	
3	1. Pursuant to Civil L.R. 6-2(b), the cutoff and designation dates related to certain	
4	expert discovery, set per the Court's Order of May 4, 2011, shall be modified as follows:	
5	(a) The deadline for <b>Defendants' Designation of Experts</b> is <b>June 27, 2011</b> ;	
6	(b) The deadline for <b>Plaintiffs' Expert Rebuttal</b> is <b>July 14, 2011</b> ;	
7	(c) Expert Discovery Cutoff is August 1, 2011.	
8	2. All other dates set pursuant to the Court's Pretrial Preparation Order of October	
9	27, 2010 shall remain in place.	
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11	Dated: 6/21/11	
12	Hon. Susan Illston United States District Court Judge	
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	STIPULATION AND [PROPOSED] ORDER MODIFYING CERTAIN EXPERT3CASE NO. CV-09-03156 SIDISCOVERY DEADLINES3	

Fenwick & West LLP Attorneys at Law San Francisco

## **Exhibit A**

I	Case3:09-cv-03156-SI Document196 Filed05/05/11 Page4 of 8	
1	[PROPOSED] ORDER	
2	PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:	
3	1. Pursuant to Civil L.R. 6-2(b), the cutoff and designation dates related to expert	
4	discovery, set per the Court's Order of March 18, 2011, shall be modified as follows:	
5	(a) Plaintiffs' Designation of Experts is May 23, 2011;	
6	(b) Defendants' Designation of Experts is June 13, 2011;	
7	(c) Plaintiffs' Expert Rebuttal is June 30, 2011;	
8	(d) Expert Discovery Cutoff is July 18, 2011.	
9	2. All subsequent dates set pursuant to the Court's Pretrial Preparation Order of	
10	October 27, 2010 shall remain in place.	
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12	Dated: 5/4/11 Hon. Susan Illston	
13	United States District Court Judge	
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	STIPULATION AND [PROPOSED] ORDER MODIFYING EXPERT DISCOVERY1CASE NO. CV-09-03156 SIDEADLINES1CASE NO. CV-09-03156 SI	

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