

1 **KERSHAW, CUTTER & RATINOFF, LLP**  
 2 Stuart C. Talley (State Bar No. 180374)  
 3 Email: [stalley@kcrlegal.com](mailto:stalley@kcrlegal.com)  
 4 401 Watt Avenue  
 5 Sacramento, California 95864  
 6 Telephone: (916) 448-9800  
 7 Facsimile: (916) 669-4499

8 [Additional Counsel Listed on Signature Page]

9 Attorneys for Plaintiffs and the Class

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 HAIDEE ESTRELLA, an individual,  
 13 and ANGELICA ARITA, an individual, on  
 14 behalf of themselves and all others similarly  
 15 situated, and on behalf of the general public,

16 Plaintiffs,

17 v.

18 FREEDOM FINANCIAL NETWORK, LLC, a  
 19 Delaware limited liability company; FREEDOM  
 20 DEBT RELIEF, INC., a California corporation;  
 21 FREEDOM DEBT RELIEF, LLC, a Delaware  
 22 limited liability company; GLOBAL CLIENT  
 23 SOLUTIONS, LLC; ROCKY MOUNTAIN  
 24 BANK AND TRUST; ANDREW HOUSSER;  
 25 and BRADFORD STROH and DOES 1 through  
 26 100,

27 Defendants.

) Case No. 09-03156 SI

) **STIPULATION TO CHANGE**  
 ) **BRIEFING SCHEDULE RELATING**  
 ) **TO PLAINTIFFS' MOTION TO 1) LIFT**  
 ) **STAY; 2) GRANT LEAVE TO AMEND**  
 ) **COMPLAINT TO ADD NEW CLASS**  
 ) **REPRESENTATIVES AND CREATE**  
 ) **SUB-CLASS; AND/OR 3) GRANT**  
 ) **LEAVE TO INTERVENE;**  
 ) **DECLARATION OF STUART C.**  
 ) **TALLEY IN SUPPORT THEREOF**

) **[N.D. Cal. L.R. 6-2]**

28 By and through their respective counsel of record, the parties stipulate and agree as follows:

1. Plaintiffs filed their Motion to Lift Stay; Grant Leave To Amend Complaint To Add New Class Representatives And Create Sub-Class; And/Or Grant Leave To Intervene on July 19, 2011 [Dkt. No. 209], setting the hearing for August 26, 2011. On August 1, 2011, Plaintiffs filed a Notice of Continuation of Hearing [Dkt. No. 212] to September 9, 2011. On August 2, 2011, the





**DECLARATION OF STUART C. TALLEY**

I, Stuart C. Talley, declare and state as follows:

1. I am an attorney duly licensed to practice before this Court, and am partner with KERSHAW, CUTTER & RATINOFF LLP, co-counsel for plaintiffs in the above-entitled action. The matters referred to in this Declaration are based upon my best personal knowledge and belief, and if called and sworn as a witness, I could and would competently testify as to each of them.

2. Plaintiffs filed their Motion to Lift Stay; Grant Leave to Amend Complaint to Add New Class Representatives and Create Sub-Class; and/or Grant Leave to Intervene on July 19, 2011 [Dkt. No. 209], setting the hearing for August 26, 2011. On August 1, 2011, Plaintiffs filed a Notice of Continuation of Hearing [Dkt. No. 212] re-setting the hearing for September 9, 2011. On August 2, 2011, the Court entered Docket Text moving the hearing on Plaintiffs' motion to September 9, 2011 and setting replies due by August 22, 2011. Also on August 2, 2011, Defendants filed papers in opposition to Plaintiffs' motion [Dkt. No. 213]

3. For scheduling and convenience purposes, the parties propose that Plaintiffs' reply briefs in support of its Motion to Lift Stay; Grant Leave To Amend Complaint To Add New Class Representatives And Create Sub-Class; And/Or Grant Leave To Intervene [Dkt. No. 209] be filed by September 6, 2011, and that the hearing on Plaintiffs' filed motion (currently scheduled for September 9, 2011) is obviated and should be continued to September 23, 2011 at 9:00 a.m. or a later date and time convenient for the Court..

5. Pursuant to N.D. Cal. Local R. 6-1(b) and 6-2, the parties seek approval of this stipulated request for an order changing time, as the agreements set forth in paragraph 3 affect dates involving papers required to be filed with the Court and a hearing date currently set on the Court's calendar.

///  
///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

7. The extensions of time requested herein would require continuation of the hearing on the Motion from September 9, 2011, to September 23, 2011.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 22nd day of August 2011 at Sacramento, California.

/s/ Stuart C. Talley  
STUART C. TALLEY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

For good cause shown, the Court hereby enters the Stipulation set forth above as the Order of the Court. The schedule in this case is hereby modified as follows:

- a. Plaintiffs will have until September 6, 2011 to its file reply brief to Plaintiffs' Motion to Lift Stay; Grant Leave To Amend Complaint To Add New Class Representatives And Create Sub-Class; And/Or Grant Leave To Intervene on July 19, 2011 [Dkt. No. 209]; and
- b. The motion hearing on set for September 9, 2011 on Plaintiffs' Motion to Lift Stay; Grant Leave To Amend Complaint To Add New Class Representatives And Create Sub-Class; And/Or Grant Leave To Intervene on July 19, 2011 [Dkt. No. 209] is continued to September ~~7~~<sup>22</sup>, 2011 at 9:00 a.m.

**IT IS SO ORDERED**

Dated: 8/25/11, 2011

By:   
\_\_\_\_\_  
HONORABLE SUSAN ILLSTON