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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**
) **HEARING DATE ON 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

1 court entered Docket Text moving the hearing on Plaintiffs’ motion to September 9, 2011 and
2 setting replies due by August 22, 2011. Also on August 2, 2011, Defendants filed papers in
3 opposition to Plaintiffs’ motion [Dkt. No. 213]. On August 25, 2011, the court entered an order
4 requiring Plaintiffs’ reply briefs in support of its Motion be filed by September 6, 2011, and that
5 the hearing be continued to September 22, 2011 at 9:00 a.m. On September 6, 2011, Plaintiffs filed
6 their reply brief in support of Plaintiffs’ motion [Dkt. No. 217].

7 2. The hearing on Plaintiffs’ motions is currently set for September 22, 2011 at 9:00
8 a.m.. The parties have met and conferred and propose the motion hearing be continued to
9 September 30, 2011 at 9:00 a.m. or a later date and time convenient for the Court.

10 3. Pursuant to N.D. Cal. Local R. 6-1(b) and 6-2, the parties seek approval of this
11 stipulated request for an order changing time, as the agreement set forth in paragraph 2 affects a
12 hearing date currently set on the Court’s calendar.

13 4. The extensions of time requested herein would require continuation of the hearing
14 on the Motions from September 22, 2011, to September 30, 2011.

15 Dated: September 7, 2011.

FENWICK & WEST LLP

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17 By: _____
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22 **Attorneys for Defendants Freedom Financial
23 Network, LLC, Freedom Debt Relief, Inc. and
24 Freedom Debt Relief, LLC**

25 Dated: September 7, 2011.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

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27 By: _____
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**Attorneys for Defendants
Andrew Houser and Bradford Stroh**

1 Dated: September 7, 2011.

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Attorneys For The Plaintiffs

General Order 45, § X Certification

The filing attorney hereby certifies that concurrence in the filing of the document has been obtained from each of the other signatories, in full accordance with N.D. Cal Gen. Ord. 45, § X(B).

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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]. On August 25, 2011, the court entered an order that requiring Plaintiffs’ reply briefs in support of its Motion be filed by September 6, 2011, and that the hearing be continued to September 22, 2011 at 9:00 a.m. On September 6, 2011, Plaintiffs filed their reply brief in support of Plaintiffs’ motion [Dkt. No. 217].

3. For scheduling and convenience purposes, the parties propose that the hearing on Plaintiffs’ filed motion (currently scheduled for September 22, 2011) be continued to September 30, 2011 at 9:00 a.m. or a later date and time convenient for the Court..

4. 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 a hearing date currently set on the Court’s calendar.

5. The extensions of time requested herein would require continuation of the hearing on the Motion from September 22, 2011, to September 30, 2011.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 7th day of September 2011 at Sacramento, California.

/s/ Stuart C. Talley
STUART C. TALLEY

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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. The motion hearing on set for September 22, 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 30, 2011 at 9:00 a.m.

IT IS SO ORDERED

Dated: 9/9, 2011

By: 
HONORABLE SUSAN ILLSTON