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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, ANGELICA ARITA,
 13 DALE MAYS, and BEVERLY HALL,
 14 individually and on behalf of themselves and all
 15 others similarly situated, and on behalf of the
 16 general public,

17 Plaintiffs,

18 v.

19 FREEDOM FINANCIAL NETWORK, LLC, a
 20 Delaware limited liability company; FREEDOM
 21 DEBT RELIEF, INC., a California corporation;
 22 FREEDOM DEBT RELIEF, LLC, a Delaware
 23 limited liability company; GLOBAL CLIENT
 24 SOLUTIONS, LLC; ROCKY MOUNTAIN
 25 BANK AND TRUST; ANDREW HOUSSEY;
 26 and BRADFORD STROH and DOES 1 through
 27 100,

28 Defendants.

) Case No. 09-03156 SI

) **STIPULATION TO CHANGE**
) **BRIEFING SCHEDULE RELATING TO**
) **DEFENDANTS’ MOTION TO COMPEL**
) **ARBITRATION, STAY ACTION**
) **PURSUANT TO THE FEDERAL**
) **ARBITRATION ACT AND**
) **DECERTIFY CLASS IN LIGHT OF**
) **ARBITRATION; DECLARATION OF**
) **STUART C. TALLEY IN SUPPORT**
) **THEREOF**

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

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

25 1. Defendants, Freedom Financial Network, LLC, Freedom Debt Relief, Inc.,
 26 Freedom Debt Relief, LLC, Andrew Houssey, and Bradford Stroh (“Defendants”), filed their
 27 Motion to Compel Arbitration, Stay Action Pursuant to the Federal Arbitration Act and Decertify
 28 Class in Light of Arbitration on October 25, 2011 [Dkt. No. 233], setting the hearing for December

1 2, 2011. Plaintiffs requested that the hearing date be moved and, on November 7, 2011, a Notice
2 of Continuation of Hearing [Dkt. No. 235] was filed re-setting the hearing for January 20, 2012.
3 On November 8, 2011, the Court moved the hearing on Defendants' motion to January 20, 2012.

4 2. Plaintiffs have now asked for the briefing schedule to be modified as well. The
5 parties have met and conferred and propose the following changes to the above briefing schedule:

6 November 18, 2011: Opposition papers due.

7 December 9, 2011: Reply papers due.

8 3. Pursuant to N.D. Cal. Local R. 6-1(b) and 6-2, the parties seek approval of this
9 stipulated request for an order changing time, as the agreements set forth in paragraph 2 affect
10 dates involving papers required to be filed with the Court.

11 Dated: November 8, 2011.

FENWICK & WEST LLP

12
13 By: /s/ Kevin P. Muck

Kevin P. Muck

555 California Street, 12th Floor

San Francisco, CA 94104

Telephone: (415) 875-2300

**Attorneys for Defendants Freedom Financial
Network, LLC, Freedom Debt Relief, Inc. and
Freedom Debt Relief, LLC**

14
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17
18 Dated: November 8, 2011.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

19 By: /s/ Allen Ruby

Allen Ruby

525 University Ave

Suite 1100

Palo Alto, California 94301

Telephone: (650) 470-4500

**Attorneys for Defendants
Andrew Houser and Bradford Stroh**

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21
22
23
24 Dated: November 8, 2011.

KERSHAW, CUTTER & RATINOFF LLP

25
26 By: /s/ Stuart C. Talley

Stuart C. Talley

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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).

1 **DECLARATION OF STUART C. TALLEY**

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

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

8 2. Defendants filed their Motion to Compel Arbitration, Stay Action Pursuant to the
9 Federal Arbitration Act and Decertify Class in Light of Arbitration on October 25, 2011 [Dkt. No.
10 233], setting the hearing for December 2, 2011.

11 3. I requested that Defendants move the hearing and, on November 7, 2011,
12 Defendants filed a Notice of Continuation of Hearing [Dkt. No. 235] re-setting the hearing for
13 January 20, 2012. On November 8, 2011, the Court entered Docket Text moving the hearing on
14 Defendants' motion to January 20, 2012.

15 3. I also requested for the briefing schedule to be modified. The parties have met and
16 conferred and propose that Plaintiffs' opposition be filed by November 18, 2011 and Defendants'
17 reply briefs be filed by December 9, 2011.

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

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

23 Executed this 8th day of November 2011 at Sacramento, California.

24 _____
25 */s/ Stuart C. Talley*
26 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. Plaintiffs will have until November 18, 2011 to file their opposition brief to Motion to Compel Arbitration, Stay Action Pursuant to the Federal Arbitration Act and Decertify Class in Light of Arbitration [Dkt. No. 233]; and
- b. Defendants will have until December 9, 2011 to file their reply brief to Motion to Compel Arbitration, Stay Action Pursuant to the Federal Arbitration Act and Decertify Class in Light of Arbitration [Dkt. No. 233].

IT IS SO ORDERED

Dated: 11/14, 2011

By: _____

