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

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UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

HAIDEE ESTRELLA, ANGELICA ARITA,  
 DALE MAYS and BEVERLY HALL,  
 individually and on behalf of themselves and all  
 others similarly situated, and on behalf of the  
 general public,

Plaintiffs,

v.

FREEDOM FINANCIAL NETWORK, LLC a  
 Delaware limited liability company; FREEDOM  
 DEBT RELIEF, INC., a California corporation;  
 FREEDOM DEBT RELIEF, LLC, a Delaware  
 limited liability company; GLOBAL CLIENT  
 SOLUTIONS, LLC; ROCKY MOUNTAIN  
 BANK AND TRUST; ANDREW HOUSSER;  
 AND BRADFORD STROH and DOES 1  
 through 100,

Defendants.

Case No. CV-09-03156 SI

**STIPULATION AND ~~PROPOSED~~  
 ORDER CONTINUING CASE  
 MANAGEMENT CONFERENCE**

1           **WHEREAS**, on October 5, 2011, the Court issued a Clerk’s Notice scheduling a further  
2 case management conference for Friday, January 20, 2012 at 3:00 p.m.;

3           **WHEREAS**, currently pending before the Court is Defendants Freedom Debt Relief,  
4 LLC, Freedom Debt Relief, Inc., Freedom Financial Network, LLC, Andrew Housser and Brad  
5 Stroh’s (collectively, the “Freedom Defendants”) Motion To Compel Arbitration, Stay Action  
6 Pursuant To The Federal Arbitration Act And Decertify Class In Light Of Arbitration, filed  
7 October 25, 2011 (Dkt. 233) (the “Freedom Defendants’ Motion”);

8           **WHEREAS**, the hearing on the Freedom Defendants’ Motion, originally set for  
9 December 2, 2011, was subsequently rescheduled for January 20, 2011 at 9:00 a.m. (Dkt.  
10 235);

11           **WHEREAS**, Plaintiffs have moved for preliminary approval of a settlement agreement  
12 with Defendants Rocky Mountain Bank & Trust and Global Client Solutions (Dkts. 239, 239-1)  
13 and, by Order dated January 11, 2012, the Court vacated the January 13, 2012 hearing on that  
14 motion, and ordered any arguments to be made in conjunction with the January 20, 2012 hearing  
15 on the Freedom Defendants’ Motion (Dkt. 252);

16           **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial  
17 economy and efficiency to continue the January 20, 2012 Case Management Conference to  
18 February 10, 2012, a date which will provide time for the Court to render its decisions on the  
19 Freedom Defendants’ Motion and on Plaintiffs and Defendants Rocky Mountain Bank & Trust  
20 and Global Client Solutions motion for preliminary approval of settlement;

21           **IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 7-12, by and between  
22 the undersigned counsel for the Parties that:

23           1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for  
24 January 20, 2012 be vacated and rescheduled to February 10, 2012 at 2:30 p.m.,<sup>1</sup> or such other  
25 time as the Court shall determine to be appropriate; and

26           2. The associated Joint Case Management Statement deadline shall likewise be

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28 <sup>1</sup> To accommodate a preexisting scheduling conflict, counsel for Rocky Mountain Bank & Trust  
and Global Client Solutions will make arrangements to appear telephonically.

1 deferred for submission consistent with Civil L.R. 16-10(d).

2 Dated: January 12, 2012

KERSHAW, CUTTER, & RATINOFF LLP  
CLARK & MARKHAM LLP  
LAW OFFICES OF BARRON E. RAMOS  
CHARLES E. AMES, P.C.  
THE CROSLY LAW FIRM, P.C.

5 By: /s/ Stuart C. Talley  
6 Stuart C. Talley

7 Attorneys for Plaintiffs

8 Dated: January 12, 2012

FENWICK & WEST LLP

9 By: /s/ Kevin P. Muck  
10 Kevin P. Muck

11 Attorneys for Defendants  
12 FREEDOM FINANCIAL NETWORK, LLC,  
13 FREEDOM DEBT RELIEF, INC. and FREEDOM  
DEBT RELIEF, LLC

14 Dated: January 12, 2012

LAW OFFICES OF ALLEN RUBY

15 By: /s/ Allen Ruby  
16 Allen Ruby

17 Attorneys for Defendants  
18 BRADFORD STROH and ANDREW HOUSSER

19 Dated: January 12, 2012

GREENSPOON MARDER, P.A.

20 By: /s/ Richard W. Epstein  
21 Richard W. Epstein

22 Attorneys for Defendants GLOBAL CLIENT  
23 SOLUTIONS, LLC & ROCKY MOUNTAIN  
24 BANK & TRUST

25 Pursuant to General Order No. 45 Section X(B), all of the signatories concur in the filing of this  
26 stipulation.

27 Dated: January 12, 2012

FENWICK & WEST LLP

28 By: /s/ Jennifer C. Bretan  
Jennifer C. Bretan

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

3 1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for  
4 January 20, 2012 be vacated and rescheduled to February 10, 2012 at 2:30<sup>3</sup> p.m., or such other  
5 time as the Court shall determine to be appropriate; and

6 2. The associated Joint Case Management Statement deadline shall likewise be  
7 deferred for submission consistent with Civil L.R. 16-10(d).

8  
9 Dated: 1/18/12

  
Hon. Susan Illston  
United States District Court Judge