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

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

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

24 Plaintiffs,

25 v.

26 FREEDOM FINANCIAL NETWORK, LLC a  
 27 Delaware limited liability company; FREEDOM  
 28 DEBT RELIEF, INC., a California corporation;  
 29 FREEDOM DEBT RELIEF, LLC, a Delaware  
 30 limited liability company; GLOBAL CLIENT  
 31 SOLUTIONS, LLC; ROCKY MOUNTAIN  
 32 BANK AND TRUST; ANDREW HOUSSER;  
 33 AND BRADFORD STROH and DOES 1  
 34 through 100,

35 Defendants.

Case No. CV-09-03156 SI

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING CASE  
 MANAGEMENT CONFERENCE  
 AND EXTENDING CERTAIN  
 DEADLINES**

1           **WHEREAS**, by Order of January 18, 2012, and in light of the then-upcoming hearing on  
2 Defendants Freedom Debt Relief, LLC, Freedom Debt Relief, Inc., Freedom Financial Network,  
3 LLC, Andrew Houser and Brad Stroh’s (collectively, the “Freedom Defendants”) Motion To  
4 Compel Arbitration, Stay Action Pursuant To The Federal Arbitration Act And Decertify Class In  
5 Light Of Arbitration, filed October 25, 2011 (Dkt. 233) (the “Freedom Defendants’ Motion”), the  
6 Court continued the further case management conference in this matter to February 10, 2012 at  
7 3:00 p.m.;

8           **WHEREAS**, by Order of January 24, 2012 the Court granted the Freedom Defendants  
9 Motion (Dkt. 257) and ordered the parties to submit to the Court by February 8, 2012 a joint  
10 proposal detailing how notice of the Order will be issued to members of the previously certified  
11 class;

12           **WHEREAS**, Plaintiffs and the Freedom Defendants have subsequently agreed to a further  
13 settlement conference with Magistrate Judge Joseph C. Spero, set for February 14, 2012 at 9:00  
14 a.m., the results of which could affect both the nature and form of the proposed notice and the  
15 matters to be addressed at the further case management conference; and

16           **WHEREAS**, the parties respectfully submit that it is therefore in the interest of judicial  
17 economy and efficiency to continue the February 10, 2012 Case Management Conference to  
18 March 2, 2012, at which time Plaintiffs and the Freedom Defendants will have participated in the  
19 further settlement conference.

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

22           1. Pursuant to Civil L.R. 16-2, the Case Management Conference scheduled for  
23 February 10, 2012 be vacated and rescheduled to March 2, 2012 at 3:00 p.m.,<sup>1</sup> or such other time  
24 as the Court shall determine to be appropriate; and

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

27 \_\_\_\_\_  
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           3.       The time for the parties to submit to the Court a joint proposal detailing how notice  
2 of the January 24, 2012 Order will be issued to members of the previously certified class shall be  
3 extended to February 28, 2012.

4 Dated: February 3, 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.

7 By: /s/ Stuart C. Talley

8 Stuart C. Talley

9 Attorneys for Plaintiffs

10 Dated: February 3, 2012

FENWICK & WEST LLP

11 By: /s/ Kevin P. Muck

12 Kevin P. Muck

13 Attorneys for Defendants

14 FREEDOM FINANCIAL NETWORK, LLC, FREEDOM  
15 DEBT RELIEF, INC. and FREEDOM DEBT RELIEF,  
16 LLC

16 Dated: February 3, 2012

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

17 By: /s/ Allen Ruby

18 Allen Ruby

19 Attorneys for Defendants

BRADFORD STROH and ANDREW HOUSSER

20 Dated: February 3, 2012

GREENSPOON MARDER, P.A.

21 By: /s/ Richard W. Epstein

22 Richard W. Epstein

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

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

26 Dated: February 3, 2012

FENWICK & WEST LLP

27 By: /s/ Jennifer C. Bretan

28 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 February 10, 2012 be vacated and rescheduled to March 2, 2012 at 3:00 p.m., or such other time  
5 as the Court shall determine to be appropriate; and

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

8 3. The time for the parties to submit to the Court a joint proposal detailing how notice  
9 of the Court's January 24, 2012 Order will be issued to members of the previously certified class  
10 shall be extended to February 28, 2012.

11  
12 Dated: 2/6/12



13 \_\_\_\_\_  
14 Hon. Susan Illston  
15 United States District Court Judge  
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