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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

v.

FREEDOM DEBT RELIEF, LLC and ANDREW HOUSSER,

Defendants.

CASE NO.: 3:17-cv-06484-EDL

(1) **AMENDED JOINT STIPULATION TO BRIEFING SCHEDULE ON MOTIONS TO DISMISS;**

(Under separate cover)

(2) **[PROPOSED] ORDER**.

Judge: Hon. Elizabeth D. Laporte

Courtroom: E, 15th Floor

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**JOINT STIPULATION TO BRIEFING SCHEDULE ON MOTIONS TO DISMISS**

Defendants Freedom Debt Relief, LLC, and Andrew Housser and Plaintiff Consumer Financial Protection Bureau (the "CFPB") (collectively "the parties"), by and through their counsel of record, hereby agree and stipulate as follows:

On February 5, 2018, Defendants each filed a Motion to Dismiss Counts I through IV of the CFPB's Complaint (*see* ECF Nos. 33, 34);

On February 27, 2018, the Court held a Case Management Conference with the parties and referred them to Magistrate Judge Nathaniel Cousins for the purpose of engaging in a settlement conference (*see* ECF No. 40);

At the February 27, 2018 Case Management Conference, in light of the pending settlement conference, the Court took the hearing on Defendants' motions to dismiss off calendar (*see* ECF No. 40);

The parties participated in a settlement conference on May 8, 2018, but were unable to reach a settlement (*see* ECF No. 48);

At a May 15, 2018 status conference, the parties discussed motions, scheduling, and discovery, and the CFPB indicated its intent to file an amended complaint. The Court directed the parties to submit a proposed briefing schedule for Defendants' Motion to Dismiss in light of the anticipated First Amended Complaint (*see* ECF Nos. 51, 52);

On June 1, 2018, the CFPB filed its First Amended Complaint following a stipulation by Defendants and order by the Court (*see* ECF Nos. 53, 54, 55);

Defendants intend to file separate motions to dismiss the CFPB's First Amended Complaint (collectively, the "Motions to Dismiss");

The parties agree that, to accommodate various counsels' schedules and to allow all parties time to adequately and completely address the legal issues to be raised in the Motions to Dismiss, an extended briefing schedule is appropriate; and

The parties further agree that the relief requested in this Stipulation will not result in prejudice to any party or to the arguments they intend to raise in this case.

NOW, THEREFORE, the undersigned parties stipulate and agree, subject to the Court's approval, as follows:

(1) The last date for both Defendants to file an answer, motion to dismiss or other responsive pleading to the CFPB's First Amended Complaint shall be July 6, 2018;

(2) If Defendants, or either of them, file a motion to dismiss in response to the First Amended Complaint at that time, the CFPB's oppositions to such motions, if any, shall be due no later than August 10, 2018;

(3) Defendants' replies to such oppositions, if any, shall be due no later than August 31, 2018;

(4) All parties stipulate to a hearing date on September 18, 2018, at 2:00 p.m. or as soon thereafter as is convenient for the Court and the parties.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: June 11, 2018

By: */s/ Allen J. Ruby*
ALLEN J. RUBY
Attorney for Defendant
FREEDOM DEBT RELIEF, LLC

I, Allen J. Ruby, am the ECF user whose ID and password are being used to file the Amended Joint Stipulation to Briefing Schedule on Motions to Dismiss and Proposed Order thereon. In compliance with Local Rule 5-1(i)(3), I attest that Cristina C. Arguedas and Maxwell S. Peltz concur in this filing.

DATED: June 11, 2018

By: */s/ Cristina C. Arguedas*
CRISTINA C. ARGUEDAS
Attorney for Defendant
ANDREW HOUSSER

DATED: June 11, 2018

By: */s/ Maxwell S. Peltz*
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CONSUMER FINANCIAL PROTECTION BUREAU