JOSEPH L. BARLOON (*pro hac vice*)
joseph.barloon@skadden.com
ANAND S. RAMAN (*pro hac vice*)
anand.raman@skadden.com
JOHN A.J. BARKMEYER (*pro hac vice*)
john.barkmeyer@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
Telephone: (202) 371-7000
Facsimile: (202) 393-5760

ALLEN J. RUBY (SBN 47109)
allen.ruby@skadden.com
ABRAHAM M. ANDRADE III (SBN 321264)
Abraham.andrade@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
525 University Avenue
Palo Alto, California 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570

Attorneys for Defendant
FREEDOM DEBT RELIEF, LLC

Counsel continued on next page

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

JOINT STIPULATION TO STAY PROCEEDINGS AND [~~PROPOSED~~] ORDER AS MODIFIED

Judge: Hon. Elizabeth D. Laporte

Courtroom: E, 15th Floor

CRISTINA C. ARGUEDAS (SBN 87787)
arguedas@achlaw.com
RAPHAEL M. GOLDMAN (SBN 229261)
goldman@achlaw.com
ARGUEDAS, CASSMAN & HEADLEY LLP
803 Hearst Avenue
Berkeley, California 94710
Telephone: (510) 845-3000
Facsimile: (510) 845-3003

Attorneys for Defendant
ANDREW HOUSSER

MAXWELL S. PELTZ (SBN 183662)
maxwell.peltz@cfpb.gov
Telephone: (415) 633-1328
PATRICIA HENSLER (*appearing pursuant to L.R. 11-2*)
patricia.hensler@cfpb.gov
Telephone: (202) 435-7829
CHRISTOPHER J. DEAL (*appearing pursuant to L.R. 11-2*)
christopher.deal@cfpb.gov
Telephone: (202) 435-9582
HAI BINH NGUYEN (SBN 313503)
haibinh.nguyen@cfpb.gov
Telephone: (202) 435-7251
CONSUMER FINANCIAL PROTECTION BUREAU
1700 G Street, N.W.
Washington, D.C. 20552
Facsimile: (202) 435-7722

Attorneys for Plaintiff
CONSUMER FINANCIAL PROTECTION BUREAU

JOINT STIPULATION TO STAY PROCEEDINGS

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

WHEREAS, the Complaint in this action (ECF No. 1) was filed by the Bureau on November 8, 2017;

WHEREAS, the First Amended Complaint in the action (ECF No. 55) was filed by the Bureau on June 1, 2018;

WHEREAS, the parties fully briefed Defendants' motions to dismiss the First Amended Complaint (ECF Nos. 60, 61), and the Court heard oral argument on these motions on September 18, 2018;

WHEREAS, on October 2, 2018, the parties agreed in principle to resolve all claims in the First Amended Complaint;

WHEREAS, also on October 2, 2018, the parties notified the Court—by voicemail to the courtroom deputy— of their agreement in principle;

WHEREAS, the parties wish to focus their efforts on finalizing the agreement in principle without having further proceedings in this matter;

WHEREAS, the parties have agreed to request a temporary stay of all proceedings in the action until November 6, 2018;

WHEREAS, the parties have agreed to provide the Court a telephonic update on November 6, 2018, of the status of efforts to achieve a final resolution of this matter;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel, subject to approval of the Court, that:

1. All proceedings in this action shall be stayed until November 6, 2018;

2. On November 6, 2018, at a time convenient for the Court, the parties shall conduct a joint teleconference with the Court advising the Court of the status of efforts to achieve a final resolution of this matter;

3. The parties shall reserve any and all rights, claims and defenses in connection with the First Amended Complaint pending entry of a final order.

IT IS SO STIPULATED.

DATED: October 3, 2018 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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

DATED: October 3, 2018 ARGUEDAS, CASSMAN & HEADLEY LLP

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

DATED: October 3, 2018 CONSUMER FINANCIAL PROTECTION BUREAU

By: */s/ Maxwell S. Peltz*
MAXWELL S. PELTZ
Attorney for Plaintiff
CONSUMER FINANCIAL PROTECTION BUREAU

ATTESTATION

I, Allen J. Ruby, am the ECF user whose ID and password are being used to file the Joint Stipulation to Stay Proceedings 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: October 3, 2018

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Court will hold a telephonic Case Management Conference on November 6, 20018 at 10:30 a.m. Counsel must utilize the following call-in information in order to appear by phone: dial (888) 684-8852; and enter access code 537 9839.

Dated: October 4, 2018

ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE