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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 Number: 3:17-cv-06484-EDL JOINT STIPULATION TO EXTEND STAY OF PROCEEDINGS AND CONTINUE TELEPHONIC STATUS HEARING; [PROPOSED] ORDER Status Hearing Date: Feb. 26, 2019 Time: 10:00 a.m. Courtroom: E, 15th Fl. Judge: Hon. Elizabeth D. Laporte

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JOINT STIPULATION TO EXTEND STAY OF PROCEEDINGS AND CONTINUE TELEPHONIC STATUS HEARING

The parties to the above-entitled action submit this JOINT STIPULATION TO EXTEND STAY OF PROCEEDINGS AND CONTINUE TELEPHONIC STATUS HEARING AND [PROPOSED] ORDER in accordance with the Court's instructions at the January 22, 2019 telephonic status hearing.

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

WHEREAS, a stay of the proceedings has been in place since October 5, 2018 (ECF 75) to permit the parties to finalize the agreement in principle without having further proceedings in this matter;

WHEREAS, the parties continue their efforts to finalize the agreement and work through technical issues relating to the identification of consumers to receive restitution;

WHEREAS, at the January 22, 2019 telephonic status hearing, the Court instructed the parties that if a settlement had not been finalized by the scheduled February 26, 2019 telephonic status hearing, the parties could submit a joint stipulation and proposed order continuing the status hearing;

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 remain stayed;

2. That the parties propose that the next telephonic status conference be held on March 19, 2019; and

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: February 19, 2019 CONSUMER FINANCIAL PROTECTION BUREAU

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

DATED: February 19, 2019 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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

DATED: February 19, 2019 ARGUEDAS, CASSMAN & HEADLEY LLP

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

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT ORDERED THAT: this action is stayed until _____. A further telephonic status hearing is set for _____ at _____. The parties shall utilize the following dial in information in order to appear telephonically on _____: dial (888) 684-8852 and enter access code 537 9839.

Dated: February ____, 2019

_____
ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,

DATED: February 19, 2019

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

DATED: February 19, 2019

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

DATED: February 19, 2019

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