TODD A. ROBERTS (SBN 129722)
todd.roberts@rmkb.com
NICOLE S. HEALY (SBN 157417)
nicole.healy@rmkb.com
EDWIN B. BARNES (SBN 295454)
edwin.barnes@rmkb.com
ROPERS, MAJESKI, KOHN
ROPERS, MAJESKI, KOHN & BENTLEY
1001 Marshall Street, Suite 500
Redwood City, CA 94063-2052
Telephone: (650) 364-8200
Facsimile: (650) 780-1701

NOSSAMAN LLP
JAMES H. VORHIS (SBN 245034)
jvorhis@nossaman.com
JILL N. JAFFE (SBN 286625)
jjaffe@nossaman.com
50 California Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 398-3600
Facsimile: (415) 398-2438

Attorneys for Defendants
AMERICAN FINANCIAL BENEFITS CENTER, AMERITECH FINANCIAL, FINANCIAL EDUCATION BENEFITS CENTER, and BRANDON DEMOND FRERE

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMERICAN FINANCIAL BENEFITS CENTER, a corporation, also d/b/a AFB and AF STUDENT SERVICES; et al.,

Defendants.

Case No. 18-cv-00806-SBA

PARTIES' STIPULATION FOR A NINE MONTH STAY OF THIS ACTION AS TO DEFENDANT BRANDON FRERE

Judge: Hon. Saundra Brown Armstrong

Complaint filed February 7, 2018

WHEREAS Brandon Demond Frere ("Frere") is a defendant in the instant action; and

WHEREAS the United States Attorney's Office for the Northern District of California has filed a criminal complaint against Mr. Frere arising out of the same facts and circumstances that have given rise to the instant action, in a case captioned *United States v. Frere*, Case No. 3:18-mj-71724-SK (N.D. Cal.); and

WHEREAS, Mr. Frere believes he may be prejudiced if both the instant civil case and the parallel criminal case were to proceed, given the differing scope of discovery between the two actions;

NOW THEREFORE, Defendant Brandon Demond Frere and Plaintiff Federal Trade Commission ("FTC") hereby stipulate and agree to the entry of an Order staying the civil action against him for nine (9) months or until the conclusion of the parallel criminal action filed by the United States against Mr. Frere (captioned *United States v. Frere*, Case No. 3:18-mj-71724-SK (N.D. Cal.)), whichever is first.

SO STIPULATED:

Dated: February 1, 2019

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Nicole S. Healy
TODD A. ROBERTS
NICOLE S. HEALY
EDWIN B. BARNES

NOSSAMAN LLP

By: /s/ James H. Vorhis
JAMES H. VORHIS
JILL N. JAFFE
Attorneys for Defendants
AMERICAN FINANCIAL BENEFITS CENTER, AMERITECH FINANCIAL, FINANCIAL EDUCATION BENEFITS CENTER, and BRANDON DEMOND FRERE

Dated: February 1, 2019

ALDEN F. ABOTT
General Counsel

By: /s/ Sarah Schroeder
SARAH SCHROEDER
ROBERTA TONELLI
EVAN ROSE
Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City