

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City

1 TODD A. ROBERTS (SBN 129722)
todd.roberts@rmkb.com
2 NICOLE S. HEALY (SBN 157417)
nicole.healy@rmkb.com
3 EDWIN B. BARNES (SBN 295454)
edwin.barnes@rmkb.com
4 ROPERS, MAJESKI, KOHN
5 ROPERS, MAJESKI, KOHN & BENTLEY
6 1001 Marshall Street, Suite 500
Redwood City, CA 94063-2052
7 Telephone: (650) 364-8200
Facsimile: (650) 780-1701

8 NOSSAMAN LLP
9 JAMES H. VORHIS (SBN 245034)
jvorhis@nossaman.com
10 JILL N. JAFFE (SBN 286625)
jjaffe@nossaman.com
11 50 California Street, 34th Floor
San Francisco, CA 94111
12 Telephone: (415) 398-3600
Facsimile: (415) 398-2438

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

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 FEDERAL TRADE COMMISSION,
18 Plaintiff,

19 v.

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

Case No. 18-cv-00806-SBA

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

Judge: Hon. Sandra Brown Armstrong

Complaint filed February 7, 2018

Ropers Majeski Kohn & Bentley
A Professional Corporation
Redwood City

1 WHEREAS Brandon Demond Frere (“Frere”) is a defendant in the instant action; and
2 WHEREAS the United States Attorney’s Office for the Northern District of California has
3 filed a criminal complaint against Mr. Frere arising out of the same facts and circumstances that
4 have given rise to the instant action, in a case captioned *United States v. Frere*, Case No. 3:18-mj-
5 71724-SK (N.D. Cal.); and

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

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

14 SO STIPULATED:

15 Dated: February 1, 2019

ROPER, 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

24 Dated: February 1, 2019

ALDEN F. ABOIT
General Counsel
By: /s/ Sarah Schroeder
SARAH SCHROEDER
ROBERTA TONELLI
EVAN ROSE
Attorneys for Plaintiff
FEDERAL TRADE COMMISSION