

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

Jason Carr, Vicki LeMaster, Edward Ford
Services LLC, Carlton Morgan, 365 Sun
LLC and Candice Worthy, *individually and
on behalf of all others similarly situated,*

Plaintiffs,

v.

Kabbage, Inc. d/b/a K Servicing,

Defendant.

Civil Action
No.1:22-cv-01249-VMC

**CLASS ACTION
COMPLAINT**

JURY TRIAL DEMANDED

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Jason Carr, Vicki LeMaster, Edward Ford Services LLC, Carlton Morgan, 365 Sun LLC and Candice Worthy, individually and on behalf of all others similarly situated, (hereinafter "Plaintiffs") hereby respectfully request a twenty-eight (28) day extension of time through July 11, 2022, to file Plaintiffs' response to Defendant Kabbage, Inc., d/b/a K Servicing's Motion to Dismiss and request for Oral Argument (Doc. 12). Pursuant to this Court's Standing Order, III.a. (Doc. 10), Counsel for Plaintiffs conferred with Counsel for Defendant who does not oppose the motion. This is the first extension requested by Plaintiffs for this deadline, and Plaintiffs

make this request in good faith and not for the purpose of delay. A proposed Order is attached for the Court's Consideration.

Respectfully submitted this 8th day of June, 2022.

By: /s/ MaryBeth V. Gibson
MaryBeth V. Gibson, Esq.
Georgia Bar No. 725843
The Finley Firm, P.C.
Piedmont Center
3535 Piedmont Rd.
Building 14, Suite 230
Atlanta, GA 30305
(404) 978-6971
MGibson@thefinleyfirm.com

Shane R. Heskin, Esq. (*pro hac vice*)
Justin E. Proper, Esq. (Georgia Bar #
141782)
WHITE & WILLIAMS, LLP
1650 Market Street, Suite 1800
Philadelphia, PA 19103
(215) 864-6329
heskins@whiteandwilliams.com

*Attorneys for Plaintiffs & the Putative
Classes*

LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14-point Times New Roman font in accordance with Local Rule 5.1(C).

Dated: June 8th, 2022.

/s/ MaryBeth V. Gibson
MARYBETH V. GIBSON

CERTIFICATE OF SERVICE

I hereby certify that on June 8th, 2022, I filed a copy of the foregoing document using the Court's ECF/CM system, which will automatically send notice of such filing to all counsel of record in this matter.

/s/MaryBeth V. Gibson

MaryBeth V. Gibson