

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALICIA MARSHALL, DANIEL PRONSKY, and PARIS TOWNSEND, individually and on behalf of all others similarly situated,

Plaintiffs,

V.

PRETAMOS CDFI, LLC,

Defendant.

Case No. 5:21-cv-04337-JMG

**STIPULATION AND ORDER EXTENDING THE TIME FOR
DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, Plaintiffs commenced this action on October 1, 2021 by filing the Complaint (ECF No. 1);

WHEREAS, Defendant, Prestamos CDFI, LLC (“Prestamos”), received service of process on or about October 6, 2021;

WHEREAS, without extension, and pursuant to the Federal Rules of Civil Procedure, Prestamos's response to the Complaint would be due on October 27, 2021;

WHEREAS, Prestamos recently retained counsel in this matter; and

WHEREAS, despite their diligence, Prestamos and its counsel require additional time to investigate the allegations underlying Plaintiffs' claims and prepare a response;

IT IS hereby STIPULATED and AGREED by and among the undersigned counsel that the time for Prestamos to answer or otherwise respond to the Complaint shall be extended until Friday, December 10, 2021. If entered as an Order of the Court, the parties' stipulated extension

would be the first such extension entered in the action. Because no Scheduling Order has yet been entered, the extension should not affect the timing of summary judgment motions or trial.

BAILEY & GLASSER LLP

By: /s/ Lawrence J. Lederer

Lawrence J. Lederer (Pa. ID 50445)
Michael L. Murphy
(*pro hac vice*)
Patricia M. Kipnis (Pa. ID 91470)
1055 Thomas Jefferson Street NW,
Suite 540
Washington, DC 20007
T: 202-463-2101
F: 202-463-2103
llederer@baileyglasser.com
mmurphy@baileyglasser.com
pkipnis@baileyglasser.com

NOLAN HELLER KAUFFMAN LLP

Justin A. Heller
(*pro hac vice*)
Matthew M. Zapala
(*pro hac vice*)
80 State Street, 11th Floor
Albany, NY 12207
T: 518-449-3300
jheller@nhkllp.com
mzapala@nhkllp.com

Attorneys for Plaintiffs

Dated: October 26, 2021

BALLARD SPAHR LLP

By: /s/ Marcel S. Pratt

Marcel S. Pratt (Pa. ID 307483)
Michael R. McDonald (Pa. ID 326873)
1735 Market Street, 51st Floor
Philadelphia, PA 19103
T: 215-665-8500
F: 215-864-8999
PrattM@ballardspahr.com
McDonaldM@ballardspahr.com

Roy Herrera
(*pro hac vice* admission to be sought)
Daniel A. Arellano
(*pro hac vice* admission to be sought)
1 East Washington Street
Suite 2300
Phoenix, AZ 85004
T: 602-798-5400
F: 602-798-5595
HerreraR@ballardspahr.com
ArellanoD@ballardspahr.com

Attorneys for Defendant

Dated: October 26, 2021

IT IS SO ORDERED.

October 26, 2021

/s/ John M. Gallagher

JOHN M. GALLAGHER
United States District Court Judge