

**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,	:	Case No. 5:21-cv-04337-JMG
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
PRESTAMOS CDFI, LLC,	:	
	:	
Defendant.	:	

**MOTION TO EXCEED PAGE LIMITS
FOR MOTION TO DISMISS BRIEFING**

Pursuant to Section II(B)(4) of the Court’s Policies and Procedures, Defendant Prestamos CDFI, LLC hereby moves the Court for leave to exceed the Court’s 20-page limit in connection with the Memorandum of Law in Support of Defendant’s Motion to Dismiss Plaintiffs’ Complaint (the “Motion”), which is filed concurrently herewith.

Exceeding the Court’s standard page limitation is necessary to adequately address the legal issues involved in the Motion. The Class Action Complaint, ECF No. 1, includes both nationwide and state-specific class allegations involving a complex, highly regulated loan scheme only recently enacted by Congress amid the COVID-19 pandemic. Resolving these claims at the pleadings stage requires Defendant to address, in a single memorandum, the legislative and regulatory background of the program and the terms of Plaintiff’s loan agreements. Defendant must also brief complex issues of federal statutory interpretation and intent, standing, and substantive analysis under common law breach-of-contract principles and California’s consumer protection statutes. Finally, because the Complaint did not include the loan agreements cited in

the Complaint and upon which resolution of the case turns, Defendant must attach them to the Motion, further adding to the page length.

Simply put, Defendant will not, despite its best efforts, have enough space to address all legal issues within the 20-page limit. Defendant has strived to be as economical as possible with its arguments.

Defendant therefore requests permission to file a Memorandum of Law in support of the Motion not to exceed 30 pages and a reply brief not to exceed 20 pages, exclusive of attachments. Defendant respectfully requests that the Court grant this motion and enter the attached proposed order.

Dated: December 10, 2021

Respectfully,

By: /s/ Marcel S. Pratt

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**pro hac vice admission to be sought*
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on December 10, 2021, I caused this Motion To Exceed Page Limits For Motion to Dismiss Briefing, along with the attached proposed order, to be filed on the Court's CM/ECF system, which served copies of same on all counsel of record via electronic mail.

/s/ Marcel S. Pratt
Marcel S. Pratt