

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

ALICIA MARSHALL, DANIEL PRONSKY,	:	
PARIS TOWNSEND, NANCILEE HOLLAND,	:	
LEONA OWSLEY, KOLAWOLE AHMADOU,	:	Case No. 5:21-cv-04337-JMG
KIANA DERVIN, KRISTINA HENDERSON,	:	
DUSTIN INNIS, KELLY STALNAKER and	:	
JAMIE JONES, individually and on behalf of all	:	
others similarly situated,	:	
	:	
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 Prestamos’s Memorandum of Law in Support of Its Motion to Dismiss Plaintiffs’ Amended 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. Plaintiffs filed their Class Action Amended Complaint on January 14, 2022, ECF No. 18, which added to the original pleadings eight named plaintiffs, two statutory claims, and nearly double the number of pages. It includes both nationwide and state-specific class allegations involving a complex, heavily regulated loan scheme only recently enacted by Congress in response to the COVID-19 pandemic. Prestamos believes it has strong justifications for resolving these claims at the pleadings stage. But doing so will require Prestamos to address, in a single memorandum, the legislative and regulatory background of the loan program; the terms of

relevant loan documents; and complex issues of federal and state statutory interpretation, standing and causes of action, contractual construction, and substantive analysis under the common and statutory laws of multiple states.

Simply put, Prestamos will not, despite its best efforts, have sufficient space to address all of the Amended Complaint's deficiencies and legal issues within the 20-page limit. Prestamos has strived to be as economical as possible with its arguments.

Prestamos therefore requests permission to file a Memorandum of Law in support of the Motion not to exceed 35 pages, and a reply brief not to exceed 25 pages, exclusive of attachments.

Prestamos's previous Motion to Exceed Page Limits for Motion to Dismiss Briefing, ECF No. 14, was granted by this Court on January 20, 2022, ECF No. 21. Prestamos now requests an additional extension of the page limit to account for the addition of claims, parties, and allegations to the Amended Complaint.

Prestamos respectfully requests that the Court grant this motion and enter the attached proposed order.

Dated: February 14, 2022

Respectfully,

By: /s/ Marcel S. Pratt

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**pro hac vice admission to be sought*

*Attorneys for Defendant
Prestamos CDFI, LLC*