

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

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|------------------------------------------------|---|----------------------------|
| 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 and CHICANOS               | : |                            |
| POR LA CAUSA, INC.,                            | : |                            |
|                                                | : |                            |
| Defendants.                                    | : |                            |

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

Pursuant to Section II(B)(4) of the Court’s Policies and Procedures, Defendants Prestamos CDFI, LLC (“Prestamos”) and Chicanos Por La Causa, Inc. (“CPLC”) hereby move the Court for leave to exceed the Court’s 20-page limit in connection with Prestamos and CPLC’s Memorandum of Law in Support of Defendants’ Motion to Dismiss Plaintiffs’ Second 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 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. Plaintiffs filed a Second Amended Complaint on May 20, 2022, ECF No. 42, which added an additional defendant, CPLC, a new claim, and another fifteen pages,

exclusive of attachments. Defendants believe they have strong justifications for resolving these claims at the pleadings stage. But doing so will require Defendants 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, personal jurisdiction and alter ego liability, contractual construction, and substantive analysis under the common and statutory laws of multiple states.

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

Defendants therefore request permission to file a Memorandum of Law in support of the Motion not to exceed 45 pages, and a reply brief not to exceed 30 pages, exclusive of attachments.

Prestamos's previous Motion to Exceed Page Limits for Motion to Dismiss Briefing, ECF No. 23, was granted by this Court on February 15, 2022, ECF No. 25. Defendants now request an additional extension of the page limit to account for the addition of claims, parties, and allegations to the Second Amended Complaint.

Defendants respectfully request that the Court grant this motion and enter the attached proposed order.

Dated: June 3, 2022

Respectfully,

By: /s/ Marcel S. Pratt

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*\*pro hac vice admission to be sought*

*Attorneys for Defendants*