

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

ALICIA MARSHALL, DANIEL
PRONSKY, PARIS TOWNSEND,
NANCILEE HOLLAND, LEONA
OWSLEY, KOLAWOLE AHMADOU,
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.

Civil Action No. 5:21-cv-04337-JMG

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMIT FOR
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

Pursuant to Section II(B)(4) of the Court's Policies and Procedures, Plaintiffs hereby move the Court for leave to exceed the Court's 20-page limit in opposing defendant Prestamos CDFI, LLC's Motion to Dismiss Plaintiffs' Amended Complaint (the "Motion to Dismiss").

On February 14, 2022, Defendant filed concurrent with its Motion to Dismiss a separate Motion to Exceed Page Limits, seeking permission to file a Memorandum of Law in support of the Motion to Dismiss of up to 35 pages, and a reply brief of up to 25 pages. ECF 23, at 2. The Court granted Defendant's Motion to Exceed Page Limits the following day. Order, ECF 25.

Defendant's Motion to Exceed Page Limits did not address page limits for Plaintiffs' opposition memorandum, as Defendant did not contact Plaintiffs to discuss that Motion in advance of its filing. Plaintiffs contacted Defendant in advance of filing this Motion, and Defendant advised that it would not oppose Plaintiffs' request that the Court allow Plaintiffs up

to 35 pages for their opposition to the Motion to Dismiss. Plaintiffs respectfully request permission to file a memorandum in opposition to the Motion to Dismiss of up to 35 pages to address Defendant's arguments in the Motion to Dismiss, and given that Defendant's reply memorandum also may far exceed the Court's default preference of page limits for briefs. See Policies and Procedures § II(B)(4).

Accordingly, Plaintiffs respectfully request that the Court grant this Motion and enter the attached proposed order.

Dated: February 22, 2022

BAILEY & GLASSER LLP

By: /s/ Lawrence J. Lederer
Lawrence J. Lederer (Pa. ID 50445)
Michael L. Murphy (admitted *pro hac vice*)
Bart D. Cohen (Pa. ID 57606)
1055 Thomas Jefferson Street NW, Suite 540
Washington, DC 20007
T.: 202.463-2101
F.: 202.463-2103
llederer@baileyglasser.com
mmurphy@baileyglasser.com
bcohen@baileyglasser.com

and

NOLAN HELLER KAUFFMAN LLP
Justin A. Heller (admitted *pro hac vice*)
Matthew M. Zapala (admitted *pro hac vice*)
80 State Street, 11th Floor
Albany, NY 12207
T.: 518.449.3300
F.: 518.432.3123
jheller@nhkllp.com
mzapala@nhkllp.com

Attorneys for Plaintiffs and the Proposed Classes

CERTIFICATE OF SERVICE

I hereby certify that, on February 22, 2022, I caused Plaintiffs' Motion to Exceed Page Limit for Opposition to Defendant's Motion to Dismiss, along with the attached proposed order, to be filed on the Court's CM/ECF system and for service of same on all counsel of record via electronic mail.

/s/ Lawrence J. Lederer

Lawrence J. Lederer