

**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 and
CHICANOS POR LA CAUSA, INC.,

Defendants.

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

**STIPULATION AND PROPOSED ORDER EXTENDING THE TIME FOR
DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO THE SECOND
AMENDED COMPLAINT**

WHEREAS, the Court Granted in Part and Denied in Part Defendants’ Motion to Dismiss the Second Amended Complaint (“SAC”) on March 30, 2023 (ECF Nos. 56 and 57);

WHEREAS, the Court denied Defendants’ Motion to Dismiss as to Defendant CHICANOS POR LA CAUSA, INC. (“CPLC”) for lack of personal jurisdiction under Rule 12(b)(2) without prejudice and subject to limited jurisdictional discovery on the Court’s personal jurisdiction over CPLC;

WHEREAS, Defendant CPLC is permitted to renew its motion to dismiss after limited jurisdictional discovery, which the Court ordered shall take place pursuant to the terms of its March 30, 2023 Order (ECF No. 57);

WHEREAS, without extension, and pursuant to the Federal Rules of Civil Procedure, Defendant Prestamos CDFI LLC's ("Prestamos") answer to the SAC would be due on April 13, 2023;

WHEREAS, no Scheduling Order has been entered in this matter and therefore the extension requested will not affect the timing of summary judgment motions or trial;

IT IS hereby **STIPULATED** and **AGREED** by and among the undersigned counsel that:

1. The time for Prestamos to answer the SAC shall be extended until Thursday, April 27, 2023.

2. CPLC shall not be required to answer the SAC pending decision on its renewed motion to dismiss for lack of personal jurisdiction, which will be filed after limited jurisdictional discovery and in accordance with a schedule decided by the Court after the parties file their submissions regarding limited jurisdictional discovery. Plaintiffs shall be allowed no less than 21 days to respond to CPLC's renewed motion to dismiss for lack of personal jurisdiction.

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Attorneys for Plaintiffs and the Proposed Class

Dated: April 13, 2023

IT IS SO ORDERED.

April 14, 2023

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**pro hac vice admission to be sought*

Attorneys for Defendants

Dated: April 13, 2023

/s/ John M. Gallagher

HON. JOHN M. GALLAGHER,
United States District Judge