

**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 RENEWED
MOTION TO DISMISS BRIEFING ADDRESSED TO PERSONAL JURISDICTION**

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 Court’s June 2, 2023 Order (ECF No. 75), Defendant CPLC’s Renewed Motion to Dismiss Plaintiffs’ SAC for Lack of Personal Jurisdiction (the “Motion”) would be due on October 6, 2023, Plaintiffs’ response to the Motion (the “Response”) would be due on October 20, 2023, and CPLC’s reply in further support of its Motion (the “Reply”) would be due on October 27, 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 CPLC to file its Motion shall be extended until October 13, 2023.
2. The time for Plaintiffs to file their Response to CPLC’s Motion shall be extended until October 27, 2023.
3. The time for CPLC to file its Reply in further support of its Motion shall be extended until November 3, 2023.

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*Attorneys for Plaintiffs and the Proposed Class
and Subclasses*

Dated: October 4, 2023

IT IS SO ORDERED.

October 6, 2023

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Dated: October 4, 2023

/s/ John M. Gallagher

HON. JOHN M. GALLAGHER,
United States District Judge