

**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.

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

JOINT PROPOSED JURISDICTIONAL DISCOVERY PLAN

Pursuant to the Court's Order filed May 16, 2023 (ECF No. 73), Plaintiffs Alicia Marshall, Daniel Pronsky, Paris Townsend, Nancilee Holland, Leona Owsley, Kolawole Ahmadou, Kiana Dervin, Kristina Henderson, Dustin Innis, Kelly Stalnaker and Jamie Jones (collectively, "Plaintiffs"), and defendants Prestamos CDFI, LLC ("Prestamos") and Chicanos Por La Causa, Inc. ("CPLC") (collectively "Defendants") have met and conferred, and submit this joint proposed jurisdictional discovery plan.

1. Plaintiffs shall serve, and Defendants shall collectively respond to the following written discovery requests. Defendants reserve all rights to object to written discovery as they would in the normal course as permitted by the Federal Rules of Civil Procedure.

- a. no more than fifteen (15) requests for production of documents pursuant to Rule 34;

- b. no more than ten (10) interrogatories pursuant to Rule 33; and
- c. no more than twelve (12) requests for admissions pursuant to Rule 36.

2. Plaintiffs shall take the following depositions, each of which shall be limited three and one-half (3.5) hours on the record. Defendants reserve all rights to object to deposition topics and deposition questions as they would in the normal course as permitted by the Federal Rules of Civil Procedure.

- a. one (1) 30(b)(6) deposition of Prestamos for which Mr. Jose Martinez will be the corporate designee; and
- b. one (1) deposition 30(b)(6) deposition of CPLC for which Alicia Nunez will be the corporate designee.

3. None of the above-referenced discovery shall be counted against any discovery limits that may otherwise apply to Plaintiffs at any point in this case.

4. Plaintiffs shall serve written discovery directed to personal jurisdiction on Defendants no later than fourteen (14) days after the Court's entry of an order adopting a jurisdictional discovery plan.

5. Defendants shall serve written responses to Plaintiffs' written discovery within 30 days after Plaintiffs' service of written discovery.

6. Defendants shall substantially complete their production of documents responsive to Plaintiffs' written discovery within 40 days after Defendants serve written responses to that discovery.

7. Defendants shall produce privilege logs no later than fourteen (14) days after making their document productions, and within fourteen (14) days after making any supplemental document productions.

8. Plaintiffs will take the Rule 30(b)(6) depositions of Defendants within 45 days after Defendants substantially complete their production of documents.

9. CPLC shall file any brief in support of its motion to dismiss or renewed motion to dismiss on grounds of personal jurisdiction within twenty-one (21) days after the completion of the last of the two above-referenced depositions.

10. Plaintiffs shall file a responsive brief to any such motion or renewed motion to dismiss within thirty (30) days after CPLC files its above-referenced brief.

11. CPLC may file a reply brief addressed to personal jurisdiction within ten (10) days after Plaintiffs file the above-referenced responsive brief.

12. The following chart reflects the parties' proposed schedule for jurisdictional discovery.

Event	Deadline
Plaintiffs serve written discovery	14 days after the Court's entry of an order adopting a jurisdictional discovery plan
Defendants serve written responses to Plaintiffs' written discovery	30 days after Plaintiffs' service of discovery
Defendants produce documents responsive to Plaintiffs' written discovery	40 days after Defendants' serve written responses
Defendants produce privilege logs	14 days after Defendants' initial production, 14 days after any supplemental production
Plaintiffs take Rule 30(b)(6) depositions of Defendants	45 days after Defendants' initial production of documents
CPLC files brief addressed to personal jurisdiction	21 days after completion of depositions
Plaintiffs file response brief addressed to personal jurisdiction	30 days after CPLC files its brief addressed to personal jurisdiction
CPLC may file reply brief addressed to personal jurisdiction	10 days after Plaintiffs file response brief addressed to personal jurisdiction

13. The foregoing proposed schedule is subject to the parties' good faith compliance with the foregoing discovery. To the extent the parties have a dispute concerning any of the discovery, they shall meet and confer and seek to resolve their dispute, failing which they may promptly bring the dispute to the Court.

Dated: May 19, 2023

Respectfully submitted,

Ballard Spahr LLP

By: /s/ Marcel S. Pratt
Marcel S. Pratt (Pa. ID 307483)
Timothy D. Katsiff (Pa. ID 75490)
Thomas J. Gallagher IV (Pa. ID 316269)
Alexa L. Levy (Pa. ID 327973)
1735 Market Street, 51st Floor
Philadelphia, PA 19103
T: 215-665-8500
F: 215-864-8999
PrattM@ballardspahr.com
KatsiffT@ballardspahr.com
GallagherT@ballardspahr.com
LevyA@BallardSpahr.com

Herrera Arellano LLP

Roy Herrera*
Daniel A. Arellano*
Jillian L. Andrews*
Austin T. Marshall*
1001 North Central Avenue, Suite 404
Phoenix, AZ 85004
T: 602-567-4820
Roy@ha-firm.com
Daniel@ha-firm.com
Jillian@ha-firm.com
Austin@ha-firm.com

**pro hac vice admission forthcoming*

Attorneys for Defendants

Bailey & Glasser LLP

By: /s/ Lawrence J. Lederer
Lawrence J. Lederer (Pa. ID 50445)
Bart D. Cohen (Pa. ID 57606)
1622 Locust Street
Philadelphia, PA 19103
T.: 202.463-2101
F.: 202.463-2103
llederer@baileyglasser.com
bcohen@baileyglasser.com

Bailey & Glasser LLP

Michael L. Murphy (admitted *pro hac vice*)
1055 Thomas Jefferson Street NW, Suite 540
Washington, DC 20007
T.: 202.463.2101
F.: 202.463.2103
mmurphy@baileyglasser.com

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 Class and Subclasses*