

**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

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

Pursuant to Section II(B)(4) of the Court’s Policies and Procedures, the parties jointly move the Court for leave to exceed the Court’s 20-page limit in connection with Chicanos Por La Causa, Inc.’s (“CPLC”) Memorandum of Law in Support of Its Renewed Motion to Dismiss Plaintiffs’ Second Amended Complaint (the “Motion”), which will be filed on October 6, 2023, and Plaintiffs’ response thereto.

On March 30, 2023, the Court granted in part and denied in part Defendants’ Motion to Dismiss the Second Amended Complaint, permitting limited jurisdictional discovery to proceed as to CPLC. (ECF Nos. 56 and 57.) Jurisdictional discovery has concluded, and pursuant to the Court’s prior order CPLC will move to dismiss CPLC from this action for lack of jurisdiction and pursuant to Rule 12(b)(6).

Good cause exists to exceed the Court's standard page limitation because CPLC's Motion and Plaintiffs' opposition will rely on evidence concerning jurisdictional discovery. The Court's Policies and Procedures limit opening briefs in support of motions to 20 pages inclusive of attachments and addenda. The parties request the following page limits for briefing of CPLC's motion: (1) a limit of 20 pages exclusive of attachments and addenda for CPLC's opening brief and Plaintiffs' Opposition Brief; and (2) a limit of 10 pages exclusive of attachments and addenda for CPLC's reply brief.

The parties respectfully request that the Court grant this joint motion and enter the attached proposed order.

Dated: October 3, 2023

Ballard Spahr LLP

By: 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 (admitted *pro hac vice*)
Daniel A. Arellano (admitted *pro hac vice*)
Jillian L. Andrews (admitted *pro hac vice*)
Austin T. Marshall (admitted *pro hac vice*)
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

Attorneys for Defendants

Respectfully submitted,

Bailey & Glasser LLP

By: 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*

CERTIFICATE OF SERVICE

I, Marcel S. Pratt, hereby certify that on this 3rd day of October 2023, I caused a copy of the foregoing Motion and accompanying papers to be served on all counsel of record via the Court's ECF system.

/s/ Marcel S. Pratt

Marcel S. Pratt