

EXHIBIT 1

Burruss, Chesley

From: Bart D. Cohen <bcohen@baileyglasser.com>
Sent: Tuesday, April 23, 2024 4:37 PM
To: Katsiff, Timothy D; Pratt, Marcel S.; Lawrence J. Lederer
Cc: jheller@nhkllp.com; mzapala@nhkllp.com; Michael L. Murphy; Longley, Henry; Gallagher, Thomas J.; Burruss, Chesley; AUSTIN@ha-firm.com; DANIEL@ha-firm.com; JILLIAN@ho-firm.com; ROY@ha-firm.com
Subject: Re: MARSHALL et al v. PRESTAMOS CDFI, LLC -- Scheduling Order

⚠ EXTERNAL

Tim,

We intend to produce supplemental interrogatory responses and any additional documents we have by the end of the next week. However, we cannot agree to your proposed schedule. You may inform the Court that we take no position as to that proposal but do reserve the right to respond to your forthcoming motion or other submission to the Court if we determine that it merits a response.

Thanks,

Bart

Bart D. Cohen

Of Counsel

Bailey & Glasser, LLP

T: 215.274.9420

From: Katsiff, Timothy D <KatsiffT@ballardspahr.com>

Sent: Monday, April 22, 2024 12:04:54 PM

To: Bart D. Cohen <bcohen@baileyglasser.com>; Pratt, Marcel S. <PrattM@ballardspahr.com>; Lawrence J. Lederer <llederer@baileyglasser.com>

Cc: jheller@nhkllp.com <jheller@nhkllp.com>; mzapala@nhkllp.com <mzapala@nhkllp.com>; Michael L. Murphy <MMurphy@baileyglasser.com>; AUSTIN@ha-firm.com <AUSTIN@ha-firm.com>; DANIEL@ha-firm.com <DANIEL@ha-firm.com>; Longley, Henry <longleyh@ballardspahr.com>; JILLIAN@ho-firm.com <JILLIAN@ho-firm.com>; ROY@ha-firm.com <ROY@ha-firm.com>; Gallagher, Thomas J. <GallagherT@ballardspahr.com>; Burruss, Chesley <burrussc@ballardspahr.com>

Subject: RE: MARSHALL et al v. PRESTAMOS CDFI, LLC -- Scheduling Order

CAUTION: External Email

Larry and Bart,

I am writing to follow up on our call this morning. As we discussed we suggest mutually presenting the following modification to the Court's schedule on class certification. The below modification is contingent on Plaintiffs completing the written discovery that they promised produce and/or look for at our last conference with the Court requiring Prestamos request to compel discovery. As we discussed, you will get back to us by the close of business tomorrow.

All fact and expert discovery in Phase (1) shall be completed by October 28, 2024.

Affirmative expert reports in Phase (1), if any, are due by September 13, 2024.

Rebuttal expert reports in Phase (1), if any, are due by October 11, 2024.

Expert depositions, if any, shall be concluded no later than June 28, 2024.

All motions for class certification shall be filed by November 1, 2024. Responses shall be filed no later than December 3, 2024. Motions and responses shall be filed in the form prescribed in Judge Gallagher's Policies and Procedures, except that briefing shall be limited to 30 pages, not including exhibits, table of contents or tables of authorities.

A hearing on class certification shall be held on [to be filled in based on the Court's schedule].

Best,

Tim

From: Bart D. Cohen <bcohen@baileyglasser.com>

Sent: Thursday, April 18, 2024 12:04 PM

To: Pratt, Marcel S. <PrattM@ballardspahr.com>; Lawrence J. Lederer <llederer@baileyglasser.com>

Cc: jheller@nhkllp.com; mzapala@nhkllp.com; Michael L. Murphy <MMurphy@baileyglasser.com>; Katsiff, Timothy D <KatsiffT@ballardspahr.com>; AUSTIN@ha-firm.com; DANIEL@ha-firm.com; Longley, Henry <longleyh@ballardspahr.com>; JILLIAN@ho-firm.com; ROY@ha-firm.com; Gallagher, Thomas J. <GallagherT@ballardspahr.com>; Burruss, Chesley <burrussc@ballardspahr.com>; Bart D. Cohen <bcohen@baileyglasser.com>

Subject: RE: MARSHALL et al v. PRESTAMOS CDFI, LLC -- Scheduling Order

⚠ EXTERNAL

Marcel,

We can talk on Monday after 10:30 eastern, except for 12:00-12:30 and 3:00-3:45.

Best,

Bart

Bart D. Cohen

Of Counsel

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From: Pratt, Marcel S. <PrattM@ballardspahr.com>
Sent: Wednesday, April 17, 2024 4:10 PM
To: Bart D. Cohen <bcohen@baileyglasser.com>; Lawrence J. Lederer <llederer@baileyglasser.com>
Cc: jheller@nhkllp.com; mzapala@nhkllp.com; Michael L. Murphy <MMurphy@baileyglasser.com>; Katsiff, Timothy D <KatsiffT@ballardspahr.com>; AUSTIN@ha-firm.com; DANIEL@ha-firm.com; Longley, Henry <longleyh@ballardspahr.com>; JILLIAN@ho-firm.com; ROY@ha-firm.com; Gallagher, Thomas J. <GallagherT@ballardspahr.com>; Burruss, Chesley <burrussc@ballardspahr.com>
Subject: MARSHALL et al v. PRESTAMOS CDFI, LLC -- Scheduling Order

CAUTION: External Email

Larry, Bart:

It seems prudent for the parties to meet and confer regarding the Court's scheduling order. Please send us your availability for Friday (4/19) and Monday (4/22).

Best,
Marcel

Marcel S. Pratt
He/Him/His

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