

**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,
JAMIE JONES, GEORGINA DREVNAK,
JOHN MARTIN, EZRA BEATTIE, GREGORY
LLOYD, ALYSHIA JOHNSON, LAMETRIA
MARVEL, GUY GRICHAR, JAHBRAEL
HORNE, ENOBONG ETUKNWA, and
SHARON BRADLEY SMITH, 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

**DEFENDANT CHICANOS POR LA CAUSA, INC.'S MOTION TO DISMISS
PLAINTIFFS' THIRD AMENDED CLASS ACTION COMPLAINT**

Defendant Chicanos Por La Causa, Inc. ("CPLC") hereby moves to dismiss the Third Amended Complaint ("TAC"), ECF No. 108, with prejudice for lack of personal jurisdiction under Fed. R. Civ. P. 12(b)(2) for the reasons stated in the accompanying memorandum of law.

WHEREFORE, Defendant CPLC respectfully requests that the Court enter an order granting its Motion to Dismiss and dismissing the Third Amended Complaint with prejudice.

Dated: May 15, 2024

BALLARD SPAHR LLP

By: /s/ Marcel S. Pratt

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**DEFENDANT CHICANOS POR LA CAUSA, INC.'S
CERTIFICATE OF GOOD FAITH MEET AND CONFER**

The undersigned counsel certifies that counsel for Chicanos Por La Causa, Inc. (“CPLC”), in a good faith effort to resolve the issue raised in CPLC’s Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(2), met and conferred with Plaintiffs’ counsel via video conference on May 14, 2024. The parties were unable to resolve the matter.

Dated: May 15, 2024

By: /s/ Marcel S. Pratt
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Counsel for Defendant

CERTIFICATE OF SERVICE

I, Marcel S. Pratt, hereby certify that on this 15th day of May 2024, I caused a copy of the foregoing Defendant Chicanos Por La Causa's Motion to Dismiss Plaintiffs' Third Amended Complaint and accompanying papers to be served on all counsel of record via the Court's ECF system.

/s/ Marcel S. Pratt

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