

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALICIA MARSHALL, *et al.*, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

PRESTAMOS CDFI, LLC,

Defendant.

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

**APPENDIX IN SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

Plaintiffs¹ respectfully submit this Appendix of Exhibits in Support of their Motion for Class Certification. In accordance with Judge Gallagher's Policy and Procedure I. C., Plaintiffs are filing each of the following Exhibits as a separate document on the CM/ECF system, specifically as follows:

- Ex. 1 -- the Loan Document Contract Between Prestamos and Plaintiff Marshall
- Ex. 2 -- the Loan Document Contract Between Prestamos and Plaintiff Townsend
- Ex. 3 -- the Loan Document Contract Between Prestamos and Plaintiff Henderson
- Ex. 4 -- the Loan Document Contract Between Prestamos and Plaintiff Jones
- Ex. 5 -- the Loan Document Contract Between Prestamos and Plaintiff Martin
- Ex. 6 -- the Loan Document Contract Between Prestamos and Plaintiff Lloyd
- Ex. 7 -- the Loan Document Contract Between Prestamos and Plaintiff Johnson
- Ex. 8 -- the Loan Document Contract Between Prestamos and Plaintiff Marvel
- Ex. 9 -- the Loan Document Contract Between Prestamos and Plaintiff Horne
- Ex. 10 -- the Loan Document Contract Between Prestamos and Plaintiff Smith
- Ex. 11 -- the Report of William M. Manger, Jr. ("Manger") dated July 12, 2024
- Ex. 12 -- the Report on Damages Methodology Professor Steven P. Feinstein, Ph.D., CFA ("Feinstein") dated July 12, 2024
- Ex. 13 -- the Report of William Briggs ("Briggs") dated July 12, 2024
- Ex. 14 -- the Rebuttal Report of Manger dated Aug. 9, 2024
- Ex. 15 -- the Rebuttal Report of Feinstein dated Aug. 9, 2024
- Ex. 16 -- the Rebuttal Report of Briggs dated Aug. 9, 2024
- Ex. 17 -- Plaintiffs' Proposed Trial Plan

¹ Unless otherwise noted, all capitalized terms have the meaning set forth in the Table of Abbreviations in Plaintiffs' brief in support of class certification filed herewith.

Ex. 18 -- Joint Declaration of Plaintiffs in Support of Plaintiffs' Motion for Class

Certification

Ex. 19 -- Excerpts From Phase I Deposition Testimony

Ex. 20 -- Declaration of Lawrence J. Lederer in Support of Plaintiffs' Motion for Class

Certification

Ex. 21 -- Declaration of Justin Heller in Support of Plaintiffs' Motion for Class

Certification

Ex. 22 -- law firm resume of Bailey & Glasser, LLP

Ex. 23 -- law firm resume of Nolan Heller Kauffman LLP

Ex. 24 -- Chart Identifying the Elements of Plaintiffs' Contract Claims in Pennsylvania
(the forum state) and the Class Member States

Ex. 25 -- SBA Form 1502 instructions and 1502 reports Prestamos submitted to the SBA
concerning Plaintiffs' PPP loans

Ex. 26 -- PAR forms Prestamos submitted to obtain advances from the PPPLF to fund
Plaintiffs' loans

Ex. 27 -- Spreadsheets Produced by Prestamos Identifying Class Members

Ex. 28 -- SBA PPP Loan Forgiveness Application Form 3508-S

Ex. 29 -- SBA Forgiveness Platform Lender Submission Metrics

Ex. 30 -- Prestamos' Second Interrogatories to Plaintiffs.

Dated: September 6, 2024

Respectfully submitted,

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
lleder@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

and

Nolan Heller Kauffman LLP

Justin A. Heller (*pro hac vice*)
Matthew M. Zapala (*pro hac vice*)
Gregory Zini (*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
gzini@nhkllp.com

Attorneys for Plaintiffs and the Proposed Classes

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of September, 2024, the foregoing was electronically filed and served through the Court's CM/ECF system to counsel of record.

/s/ Lawrence J. Lederer

Lawrence J. Lederer