

**EX. 21 -- DECLARATION OF JUSTIN HELLER IN
SUPPORT OF PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

**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

**DECLARATION OF JUSTIN A. HELLER IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Justin A. Heller, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States of America as follows:

1. I am over 18 years old and am competent to make this declaration which I do based on my personal knowledge. I am a partner of Nolan Heller Kauffman LLP (“NHK”), one of the attorneys for the Plaintiffs¹ in this litigation.

2. I submit this declaration in support of Plaintiffs’ accompanying motion for class certification.

3. Plaintiffs’ counsel have been retained by Plaintiffs on a contingent basis, have paid and advanced the costs of this litigation, and are committed to prosecuting and funding this action through trial and appeal to its ultimate resolution.

4. I respectfully refer the Court to the accompanying Declaration of Lawrence J. Lederer, which generally describes the services performed by Plaintiffs’ co-counsel Bailey &

¹ Capitalized terms not otherwise defined in this declaration have the meaning set forth in the Table of Abbreviations in the brief filed in support of Plaintiffs’ motion for class certification.

Glasser, LLP (“BG”) and NHK on behalf of the Plaintiffs. BG and NHK allocated the work described in Mr. Lederer’s Declaration to avoid duplication of services and to maximize efficiency for the benefit of Plaintiffs.

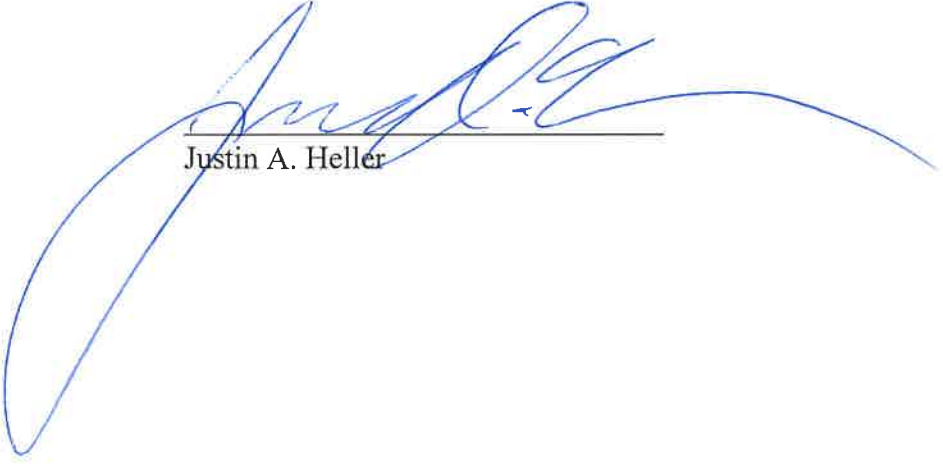
5. NHK has, among other things, fielded many inquiries from Plaintiffs and other putative class members and others seeking to be added as plaintiffs; investigated defendant Prestamos’ involvement in PPP; investigated additional facts including regarding Prestamos’ corporate parent CPLC; researched applicable law and PPP regulations; participated in the drafting of four separate detailed complaints and amended complaints; researched and analyzed issues and assisted in the drafting of briefs in opposition to multiple motions to dismiss filed by defendant Prestamos and former defendant CPLC; assisted in the preparation of Plaintiffs’ separate sets of requests for production of documents, interrogatories and requests for admission to Prestamos; reviewed documents produced by Prestamos, CPLC and others and utilized and worked with the outside document database vendor to organize and search the documents produced; prepared several of the Plaintiffs for their depositions by Prestamos, and defended them in their depositions (as allocated between BG and NHK); prepared for and conducted Plaintiffs’ deposition of Prestamos’ proposed expert Jorge Baez as part of Phase I discovery (ECF No. 102 at ¶¶ 2, 4); and researched legal issues for, and assisted in drafting, Plaintiffs’ motion for class certification, among other activities in this case.

6. We worked closely with our co-counsel, BG, on many of these tasks. NHK has extensive experience with lending and banking law; and both my firm and BG have extensive experience in commercial and other litigation including involving banks and other financial institutions. A copy of our firm resume is attached to Plas’ App’x of Exhibits Plaintiffs are filing in support of their motion for class certification. Additional information about our firms is set forth in our firm websites. See <https://www.baileyglasser.com/>; <https://nhkllp.com/>. Given our work to date,

qualifications and experience, commitment to this case, and our opinion that but for this litigation Plaintiffs and the class members will likely be deprived of any opportunity for relief for the claims at issue, I believe Plaintiffs' counsel should be appointed counsel for the Classes in accordance with Rule 23(g).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6th day of September, 2024.



Justin A. Heller