

EXHIBIT A

Burruss, Chesley

From: Lawrence J. Lederer <llederer@baileyglasser.com>
Sent: Tuesday, March 4, 2025 2:54 PM
To: Pratt, Marcel S.; Rogers, Edward; Longley, Henry; Burruss, Chesley; Gallagher, Thomas J.; Daniel Arellano; Roy Herrera; jillian@ha-firm.com
Cc: Bart D. Cohen; Michael L. Murphy; Heller, Justin A.; Zapala, Matthew M.; Gabriel R. Dos Santos
Subject: RE: Prestamos - Plaintiffs' 30(b)(6) Notice of Deposition

⚠ EXTERNAL

Marcel and team:

I write on behalf of plaintiffs following today's status conference with the Court. Plaintiffs are willing to forgo three of the four Rule 30(b)(1) depositions plaintiffs noticed last week – specifically, Nunez, Adame and Castillo – if Prestamos agrees to timely produce Martinez for deposition on or prior to the April 9, 2025 discovery deadline. This assumes Martinez would also be Prestamos' Rule 30(b)(6) designee as to at least two of the five specific Rule 30(b)(6) topics plaintiffs noticed – including specifically topic one as to Prestamos' use of the Loan Documents, and topic five as to Prestamos' policies and procedures regarding PPP lending. In addition, please advise us whether Martinez would also be Prestamos' Rule 30(b)(6) designee as to the three other Rule 30(b)(6) topics, as to which we reserve our rights. Further, as part of this proposal to narrow the pending discovery, plaintiffs would also a) agree to depose Martinez once as both a 30(b)(1) witness and Prestamos' 30(b)(6) witness, and b) expect Prestamos to provide timely answers and substantive responses to plaintiffs' RFAs rather than just objections.

Happy to further discuss if and as you want. Either way, please promptly advise as to defendant's position.

Thank you.

Larry

Lawrence J. Lederer

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