

EXHIBIT B

Burruss, Chesley

From: Lawrence J. Lederer <llederer@baileyglasser.com>
Sent: Tuesday, March 11, 2025 9:56 AM
To: Pratt, Marcel S.
Cc: Rogers, Edward; Burruss, Chesley; Gallagher, Thomas J.; Daniel Arellano; Roy Herrera; jillian@ha-firm.com; Bart D. Cohen; Michael L. Murphy; Justin A. Heller; Matthew M. Zapala; Gabriel R. Dos Santos; Beatriz Aguirre
Subject: RE: Prestamos - Plaintiffs' 30(b)(6) Notice of Deposition

⚠ EXTERNAL

Marcel and team:

Good morning. As part of our proposal to substantially narrow the pending discovery, Plaintiffs also seek to depose Mr. Castillo under Rule 30(b)(1). We understand that we also originally proposed forgoing his deposition. But that was subject to who Prestamos designates as its Rule 30(b)(6) witness(es), and Prestamos still hasn't identified its Rule 30(b)(6) designee(s) for any of the five specific topics set forth in Plaintiffs' Rule 30(b)(6) notice. To the extent that Castillo is Prestamos' 30(b)(6) designee for any of those five topics, Plaintiffs would also be willing to depose Castillo once not twice as with Martinez unless Prestamos wants the Rule 30(b)(1) and (b)(6) depositions separate.

Plaintiffs will also forgo the 30(b)(1) depositions of Nunez and Adame in full, again subject also to Prestamos also answering Plaintiffs' pending RFAs. Further, Plaintiffs are also amenable to limiting the time of both the Martinez and Castillo depositions to a maximum of up to three or four hours depending on whether they are also Prestamos' Rule 30(b)(6) designees.

Please advise. Again, if Prestamos fails to agree to produce Martinez and Castillo for deposition and identify its Rule 30(b)(6) designee(s) -- who Plaintiffs continue to believe are indeed Martinez and Castillo anyway -- we will be forced to promptly seek Judge Gallagher's intervention. If you want to discuss any aspect of this, we can do that too.

Thank you.

Larry

Lawrence J. Lederer

Partner

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From: Lawrence J. Lederer <llederer@baileyglasser.com>
Sent: Wednesday, March 5, 2025 5:41 PM
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Cc: Edward Rogers <RogersE@ballardspahr.com>; Chesley Burruss <burrussc@ballardspahr.com>; Thomas J. Gallagher <GallagherT@ballardspahr.com>; Daniel Arellano <daniel@ha-firm.com>; Roy Herrera <roy@ha-firm.com>; jillian@ha-firm.com; Bart D. Cohen <bcohen@baileyglasser.com>; Michael L. Murphy <MMurphy@baileyglasser.com>; Justin A. Heller <jheller@woh.com>; Matthew M. Zapala <mzapala@woh.com>; Gabriel R. Dos Santos <gdossantos@baileyglasser.com>; Beatriz Aguirre <beatriz@ha-firm.com>
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