

Exhibit A

**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 and JAMIE JONES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PRESTAMOS CDFI, LLC and
CHICANOS POR LA CAUSA, INC.,

Defendants.

Case No. 5:21-cv-04337-JMG

**[PROPOSED] SCHEDULING ORDER CONCERNING JURISDICTIONAL
DISCOVERY**

AND NOW, this ____ day of May, 2023, upon consideration of Plaintiffs' Proposed Jurisdictional Discovery Plan and Defendants' Response thereto, it is **ORDERED** that:

1. Plaintiffs shall serve no more than ten (10) requests for production of documents and ten (10) interrogatories directed to personal jurisdiction on Defendants within fourteen (14) days of this Order. Any interrogatories served pursuant to this Order shall not be counted against the limit prescribed by Federal Rule Civil Procedure 33. Plaintiffs shall not be entitled to serve requests for admission directed to personal jurisdiction.

2. Defendants shall serve written responses to Plaintiffs' requests for production of documents and interrogatories no later than thirty (30) days after Plaintiffs' service of Plaintiffs' requests for production of documents and interrogatories.

3. Defendants shall substantially complete production of documents responsive to Plaintiffs' requests for production of documents no later than sixty (60) days after Plaintiffs' service of Plaintiffs' requests for production of documents upon Defendants.

4. Defendants shall produce privilege logs responsive to Plaintiffs' requests for production of documents no later than fourteen (14) days after the date for substantial completion of Defendants' document production. To the extent Defendants produce additional documents after the date for substantial completion, Defendants shall produce supplemental privilege logs (if necessary) within fourteen (14) days after any such supplemental document productions.

5. No later than seven (7) days after the substantial completion of Defendants' document production, Plaintiffs shall provide Defendants notice of intent to move for leave to amend their Complaint. Plaintiffs need not seek leave to amend to add jurisdictional allegations, which may be proffered through submitted evidence in briefing.

6. If Plaintiffs do not provide Defendants with notice of intent to move for leave to amend within seven (7) days after the substantial completion of Defendants' document production, Defendants shall file any renewed motion to dismiss Plaintiffs' Complaint no later than twenty-one (21) days after the substantial completion of Defendants' document production.

7. If Plaintiffs do provide Defendants with notice of intent to move for leave to amend within seven (7) days after the substantial completion of Defendants' document production, Plaintiffs shall file any motion for leave to amend their Complaint no later than twenty-one (21) after the substantial completion of Defendants' document production.

8. Defendants shall file any response to Plaintiffs motion for leave to amend their Complaint no later than fourteen (14) days after Plaintiffs file any such motion for leave to amend their Complaint.

9. If this Court grants Plaintiffs leave to amend their Complaint, CPLC may file a renewed motion to dismiss Plaintiffs' Complaint no later than twenty-one (21) days after Plaintiffs' amended complaint is filed.

10. If CPLC files a renewed motion to dismiss Plaintiffs' Complaint, Plaintiffs may file a response in opposition to CPLC's renewed motion to dismiss no later than twenty-one (21) days after CPLC's renewed motion to dismiss is filed.

DATED: _____

Gallagher, J.