YANG SHAO
524 E 14TH AVE NAPERVILLE
IL 60563
shaoyang_suny@163.com
Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Yang Shao

Plaintiff,

VS.

Customers Bancorp, Inc.
Publicly traded holding company (NASDAQ: CUBI)
Address: 701 Reading Avenue, West Reading, PA 19611

Customers Bank
Pennsylvania-chartered bank, wholly owned subsidiary of Customers Bancorp
Address: 701 Reading Avenue, West Reading, PA 19611

Jay Sidhu
Chairman of Customers Bancorp and Executive Chairman of Customers Bank
Address: 701 Reading Avenue, West Reading, PA 19611

Sam Sidhu
President and CEO of Customers Bank, Vice Chairman of Customers Bancorp
Address: 701 Reading Avenue, West Reading, PA 19611

Karl Danielian
Senior Vice President of Customers Bank, SBA National Sales Manager
Address: 40 General Warren Blvd, Malvern, PA 19355

Rosemary Dente
Vice President, SBA Servicing and Liquidation, Customers Bank
Address: Remote office, listed business address: 521 Park Avenue, Freehold, NJ 07728

Tamara R. Thompson
Illinois Notary Public, Owner of Tamara R. Thompson Consulting, LLC
Address: 718 W Vermont St, Villa Park, IL 60181

et al.,

Defendants

Case Number: 25-cv-02640

PLAINTIFF'S MOTION FOR LEAVE TO FILE CONSOLIDATED AMENDED COMPLAINT (NUNC PRO TUNC)

Jury Trial Demanded

PLAINTIFF'S MOTION FOR LEAVE TO FILE CONSOLIDATED AMENDED COMPLAINT (NUNC PRO TUNC)

Plaintiff Yang Shao respectfully moves this Court for leave to file her Consolidated Amended Complaint nunc pro tunc, and in support thereof states as follows:

1. Procedural Background

On July 15, 2025, Plaintiff filed her "Plaintiff's Amended Complaint in Opposition to Defendant's Motion to Dismiss or Stay." Subsequently, Plaintiff submitted two additional pieces of supporting evidence. For purposes of clarity and judicial economy, Plaintiff consolidated these into a single "Plaintiff's Consolidated Amended Complaint."

2. Compliance with Federal Rule of Civil Procedure 15

Plaintiff respectfully apologizes to the Court. Due to her financial hardship, Plaintiff can only appear pro se, cannot speak or understand spoken English, and relies solely on translation tools to read and write in English. Plaintiff also has no knowledge of U.S. legal procedures. Therefore, she was unaware that, under Federal Rule of Civil Procedure 15(a)(2), any amendment after the first requires the written consent of all opposing parties or leave of the Court. Plaintiff now respectfully requests that the Court grant leave for this amendment nunc pro tunc to July 15, 2025, and deem the Consolidated Amended Complaint the operative pleading in this case.

3. Good Cause for Relief

Plaintiff filed the consolidated pleading in good faith, without intent to cause delay or prejudice to Defendants. The consolidation was intended to improve efficiency and avoid confusion, and Defendants have suffered no prejudice from the timing or manner of the filing.

4. Interests of Justice

Granting this motion will serve the interests of justice by allowing the Court and the parties to proceed on a single, accurate, and complete operative pleading that reflects all relevant allegations and supporting evidence.

WHEREFORE, Plaintiff respectfully requests that this Court grant leave to file the Consolidated Amended Complaint nunc pro tunc to July 15, 2025, deem it the operative pleading in this action, and grant such other relief as the Court deems just and proper.

Attachments:

1. Consolidated Amended Complaint

2. Supporting Exhibits 1–64

RESPECTFULLY SUBMITTED this 12th day of August 2025.

/s/ Yang Shao

YANG SHAO

YANG SHAO
524 E 14TH AVE
NAPERVILLE IL
60563
shaoyang_suny@163.com
Plaintiff

ORIGINAL of the foregoing e-filed
this 12th day of August, 2025, with:

Clerk of the Court–United States District Court for the Eastern District of Pennsylvania

/s/ Yang Shao

YANG SHAO