

SENT WITH THE APPROVAL OF THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG, <i>et al.</i>	*	IN THE
Plaintiffs	*	CIRCUIT COURT
v.	*	
	*	FOR
G & C GULF, INC. d/b/a	*	
G&G TOWING, <i>et al.</i>	*	MONTGOMERY COUNTY, MD
Defendants	*	Case No. 403885V
* * * * *	*	* * * * *

SETTLEMENT DEMAND FROM THE PLAINTIFF CLASS

AMOUNT THAT YOU NEED TO PAY IN ORDER TO SETTLE THE CLAIMS AGAINST YOU:

Description	Required Payment Per Tow Under Plaintiffs' 2019 Settlement Demand	Number of Tow(s)	Total
Liability for Tows between April 16, 2012 and April 25, 2013	\$72		
Liability for Tows between April 26, 2013 and June 23, 2017	\$400		
Additional Assessment for Defendants' Fees	\$27.00		
PAY THIS AMOUNT:			\$

THE CASE

You are receiving this notice because you are a member of a certified Defendant Class that has been sued in the Circuit Court for Montgomery County, Maryland by the Plaintiff Class. The case is called *Yang v. G&C Gulf, Inc., t/a G&G Towing, et al.*, Case No. 403885V.

In *Yang*, the Plaintiff Class claims that Defendant G&G Towing – acting under the authority of written contracts with parking lot owners, managers and/or agents throughout Montgomery County (i.e., the Defendant Class) – engaged in predatory towing of vehicles that violated duties set forth in Maryland's Towing or Removal of Vehicles from Parking Lots Law, (Md. Code Ann., Transp. §21-10A-01 *et seq.*), Montgomery County's Tow Ordinances (Montgomery County Code, § 30C-1 *et seq.*) and the common law of Maryland. On May 6, 2016, the Court entered Judgment against G&G Towing for \$22 million. The Plaintiff Class, however, also claims that the members of the Defendant Class are derivatively liable, including jointly and severally liable, for G&G Towing's violations of the law.

ACCEPTANCE OF THE SETTLEMENT DEMAND AND RELEASE

If you choose to accept the 2019 Proposed Settlement you will receive a full Release from the Plaintiff Class and will no longer be a member of the Defendant Class in the case.

HOW TO ACCEPT THE PLAINTIFFS' SETTLEMENT DEMAND

In order to accept the Plaintiffs' 2019 Proposed Settlement, you must send full payment in the method proscribed below no later than October 13, 2019. You will not receive a Release unless you pay the full amount listed on the Chart above. The Release will be in favor of your name as written above, unless you advise Class Counsel that the name should be revised. All requests to revise names for the Release must be emailed to rgordon@GWCfirm.com.

If you do not wish to accept the Plaintiffs' offer of compromise you do not have to take any additional action. However, you will remain a Defendant Class member, you will not receive a Release and litigation will proceed against you as a member of the Defendant Class.

Questions regarding the Plaintiff Class' demand should be directed to the Court appointed attorneys for the Defendant Class: James P. Ulwick and Jean Lewis of Kramon & Graham, P.A. – 410-752-6030.

METHOD OF PAYMENT

The Settlement payment must be made by check or wire transfer.

Checks must be made payable to “**G&G Towing Litigation Common Fund**” and mailed to the Escrow Administrator (Strategic Claims Services) at the following address:

Yang v. G&G Towing Litigation
600 N. Jackson Street, Suite 205
Media, PA 19063

All mailed payments must be **received** by the Escrow Administrator no later than **October 13, 2019**.

Wire Transfers may be directed as follows:

Bank Name: **The Columbia Bank**
Bank ABA: **055002338**
Beneficiary Account Number: **9 3 1 2 8 8 8 6**
Beneficiary Name: **G&G Towing Litigation Common Fund**
Customer's Address: **600 N. Jackson St, Suite 205, Media, PA 19063**

In sending the wire transfer, you are required to include in the “reference line” both your Name and Notice Number. The failure to do so may result in a delay in crediting the funds paid.

If your liability is in excess of \$600 and you choose to accept the 2019 Proposed Settlement SCS will send you a complete W-9 upon receipt of your payment.

NOTE: You will NOT receive a release from the Plaintiff Class unless and until FULL PAYMENT is received. Partial payment will not be accepted.

**BY ORDER OF THE CIRCUIT COURT
FOR MONTGOMERY COUNTY, MARYLAND.**