

QUAN-EN YANG	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	FOR
Plaintiffs,	*	MONTGOMERY COUNTY, MD.
v.	*	Case No. 403885V
G & C GULF, INC. d/b/a	*	
G&G TOWING, <i>et al.</i>	*	TRACK VI
Defendants.	*	Hon. Ronald Rubin,
	*	Specially Assigned
	*	

\* \* \* \* \*

**ADMINISTRATOR’S ACCOUNTING AND UNOPPOSED MOTION FOR AUTHORITY  
FOR PAYMENT OF ADMINISTRATION COSTS**

Representative Plaintiff files this Administrator’s Accounting and Unopposed Motion for Authority for Payment of Settlement Costs.

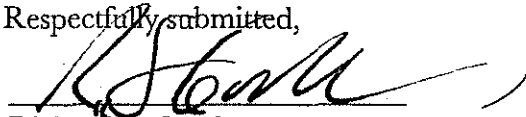
Strategic Claims Services (“SCS”), the Escrow Administrator appointed by the Court in paragraph 6 of the Order Preliminarily Approving Agreement and Setting Schedule, entered January 12, 2016 in this case, has provided the invoice dated April 15, 2016, attached hereto as Exhibit A. The invoice is for costs associated with disseminating notice of the Agreement to the Class, as ordered by the Court.

Pursuant to Paragraph 20(c) of the Agreement (Exhibit 1 to the Memorandum in Support of Preliminary Approval of Agreement and Form Manner and Administration of Notice, Dkt. No. 115), Class Counsel respectfully requests that this Invoice, in the amount of \$39,454.68, be paid from the Common Fund established under paragraph 16(d) of the Agreement.

A copy of this Request has been shared with Counsel for Defendant G&C Gulf d/b/a G&G Towing, who does not oppose it.

WHEREFORE, Representative Plaintiff respectfully requests that the Court Order that SCS be paid \$39,454.68 from the Common Fund and grant further relief as the nature of this case may require.

Respectfully submitted,



Richard S. Gordon

[rgordon@GWCfirm.com](mailto:rgordon@GWCfirm.com)

Benjamin H. Carney

[bcarney@GWCfirm.com](mailto:bcarney@GWCfirm.com)

GORDON, WOLF & CARNEY, CHTD.

102 West Pennsylvania Avenue, Suite 402 Towson,  
Maryland 21204

(410) 825-2300

Attorneys for Representative Plaintiff and the Class

**CERTIFICATE OF SERVICE**


I hereby certify, this 29<sup>th</sup> day of April, 2016, that I served a copy of the foregoing Settlement Administrator's Accounting and Unopposed Motion for Authority for Payment of Administration Costs, by first-class mail, postage pre-paid, to:

Ronald S. Canter, Esq.  
Law Offices of Ronald S. Canter, LLC  
200A Monroe St., Suite 104  
Rockville, MD 20850

Attorney for G&C Gulf, Inc.

Frederic J. Einhorn, Esq.  
27 West Jefferson Street, Suite 204  
Rockville, MD 20850

Attorney for Glen Cade, Jr.

  
\_\_\_\_\_  
Richard S. Gordon

# Exhibit A

**Strategic  
Claims  
Services**

Billing Department  
Phone: 610-891-9852  
pmulholland@strategicclaims.net

April 15, 2016

Gordon, Wolf & Carney CHTD  
102 W. Pennsylvania Avenue  
Suite 402  
Towson, MD 22104

RE: G & G Towing Settlement – Strategic Claims Services (“SCS”) Invoice

**INVOICE**

Labor charges (See Exhibit I).....	\$18,986.25
Skip tracing charges – Lexis/Nexis (See Exhibit II).....	\$7,412.65
Skip tracing charges – Lexis/Nexis (See Exhibit III).....	\$3,781.95
Printing, mailing, labeling 20,477 postcard notice (including postage).....	\$9,214.65
Phone and skip tracing charges.....	<u>\$59.18</u>
<b>Total</b>	<b><u>\$39,454.68</u></b>

Remit to: 225 State Road, Media, PA 19063

## EXHIBIT I

## EXHIBIT I

	<u>Labor</u> <u>Hours</u>	<u>Rate</u>	<u>Fee</u>
Data Entry/Clerical/CR Rep	3.75	\$45.00	\$168.75
Assistant Project Administrators	12.32	\$65.00 to \$75.00	\$862.40
Project Adminsitrators	21.00	\$85.00	\$1,785.00
Sr. Project Manager/Quality Assurance Mgr.	1.75	\$150.00	\$262.50
Director of Technology	83.00	\$155.00	\$12,865.00
Director of Operations	4.69	\$165.00	\$773.85
President	<u>8.25</u>	\$275.00	<u>\$2,268.75</u>
	<u>134.76</u>		<u>\$18,986.25</u>

Exhibit II



28330 Network Place  
Chicago, IL 60673-1283  
(866) 528-0570

LexisNexis, a division of Reed Elsevier Inc  
For itself or its affiliates

Mulholland & CO LLC dba Strategic Claims Services  
Attn : Faye Knowles  
600 N Jackson Street Suite 3  
Medla, PA 19063 USA

G. G. Towing

Previous Balance	Amount
	Total \$0.00

Payments, Credits & Adjustments	Amount
	Total \$0.00

New Activity Summary		
1/1/0001	Strategic_Claims_2016_02_16_ggtowing_10131_test.csv Batch job #60981332 - 5782 MVR VIN Hits @ \$1 each	\$5,782.00
1/1/0001	Strategic_Claims_2016_02_16_ggtowing_10131_test.csv Batch job #60981332 - 4659 Generic Hits @ \$0.35 each	\$1,630.65
	Total	\$7,412.65

Account Summary		
Previous Balance		\$0.00
New Activity		\$7,412.65
Payments, Credits & Adjustments		\$0.00
	Total Due	\$7,412.65

Please include your full invoice number on all remittance to ensure proper credit.

And  
Chub

Invoice	
Due Date:	3/20/2016
Amount Due:	USD \$7,412.65
Invoice Number:	1547472-20160229
Invoice Date:	fev. 29, 2016
Account Number:	1547472
Terms:	Net 20
Representative:	PRISCILLA STEWART
Billing Period:	2/1/2016 to 2/29/2016

Questions about your bill?  
(866) 528-0570

LNBilling@lexisnexis.com

To view account activity details online:  
1. Log on to <http://www.accurl.com>  
2. Go to "My Account" menu  
3. Click on "Billing Info"  
Note: Only Systems Administrators can view account details

Please Remit Payment To:  
LexisNexis Risk Solutions  
Account # 1547472  
28330 Network Place  
Chicago, IL 60673-1283

pd # 6387  
4/15/14

Exhibit II



FEIN: 46-3901689  
 Billing Support: 888-891-4847  
 Customer Support: 888-493-2209  
 FAX: 561-226-9717

Customer Information

**Mulholland & Co., LLC**  
**600 N Jackson St Ste 3**  
**Media, PA 19063-2564**

Account ID: 2295721  
 Invoice Date: 03/01/2016  
 Billing Period: 02/01/2016 - 02/29/2016  
 Terms: Net 30  
 Payment Preference: Paper Check

PLEASE REFERENCE YOUR ACCOUNT ID ON YOUR CHECK!

Remittance Address  
**TransUnion Risk and Alternative**  
**Data Solutions, Inc.**  
**PO Box 209047**  
**Dallas, TX 75320-9047**

TLOxp Charges & Credits

Balance Forward:	\$3,781.95
Current Charges:	\$0.00
Sales Tax:	\$0.00
Credits / Adjustments:	\$0.00

Balance Due: **\$3,781.95**

Log in to the Billing section of My Account in TLOxp to:

- Make a Payment Online
- Download Invoices
- Review Billing History
- Update Payment Preferences
  - Auto-Debit
  - Review & Approve
  - Paper Check

Please refer to the following pages for a detailed list of charges.  
 Social Security Numbers cannot be displayed in details.

*Exhibit III*

*Exhibit III*



Exhibit III

Batch Processing Summary - Jan 1, 2016 through Jan 31, 2016

Date Created	Date Returned	Batch Number	Batch Filename
2016-01-08 12:32:41		17125831	Input20160107.csv
2016-01-08 13:23:19		17127631	Input2016.csv
2016-01-08 13:32:20		17127831	Input2016.csv
2016-01-08 13:38:27		17128031	Input2016.csv
2016-01-08 13:41:54	2016-01-08 13:58:53	17128231	Input2016.csv
2016-01-25 15:55:20		17813431	munc00011a_1.txt
2016-01-25 15:57:22		17813531	Input201601251.csv
2016-01-25 16:02:14		17814031	Input201601251.csv
2016-01-25 16:08:50		17814231	Input201601251.csv
2016-01-25 16:16:43		17814731	Input201601251.csv
2016-01-25 16:23:32		17815031	Input20160125.csv
2016-01-25 16:24:47		17815231	Input201601251.csv
2016-01-25 16:26:07		17815731	Input201601251.csv
2016-01-25 16:40:26		17815931	Input201601251.csv
2016-01-25 16:44:31		17816131	Input201601251.csv
2016-01-25 16:46:38		17816231	Input201601251.csv
2016-01-25 16:52:31		17816531	Input201601251.csv
2016-01-25 16:58:43		17816731	Input201601251-1.csv
2016-01-26 14:22:51		17858531	Input20160125 (1)2.csv
2016-01-26 14:31:15		17859131	Input20160125 (1)2.csv
2016-01-26 14:35:37		17859531	Input20160125 (1)2-append.csv
2016-01-26 14:38:13		17859731	Input20160125 (1)2.csv
2016-01-26 15:04:51		17863131	Input20160125 (1)2.csv
2016-01-26 15:10:01	2016-01-26 15:41:07	17863231	Input20160125 (1)2.csv

Exhibit III

QUAN-EN YANG

On His Own Behalf and on Behalf  
of All Others Similarly Situated,

Plaintiffs,

v.

G & C GULF, INC. d/b/a  
G&G TOWING, *et al.*

Defendants.

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.

\* Case No. 403885V

\* TRACK VI  
\* Hon. Ronald Rubin,  
\* Specially Assigned  
\*

RECEIVED

MAY 02 2018

Clerk of the Circuit Court  
Montgomery County, Md.

\* \* \* \* \*

**ORDER GRANTING ADMINISTRATOR'S ACCOUNTING AND UNOPPOSED  
MOTION FOR AUTHORITY FOR PAYMENT OF ADMINISTRATION COSTS**

Upon consideration of the Administrator's Accounting and Unopposed Motion for Authority for Payment of Settlement Costs (the "Motion"), it is this \_\_\_\_ day of \_\_\_\_\_, 2016, by the Circuit Court for Montgomery County, hereby

ORDERED, that the Motion is GRANTED; and further,

ORDERED, that the April 15, 2016 invoice of Strategic Claims Services, the Escrow Administrator, in the amount of \$39,454.68, shall be paid from the Common Fund established by Paragraph 20(c) of the Agreement in this case.

\_\_\_\_\_  
Hon. Ronald B. Rubin  
Judge, Circuit Court for Montgomery County