

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

**AFFIDAVIT OF SERVICE**

I, Catherine Stuckrath, state as follows:

1. I am a competent person over the age of eighteen and not a party to the case.
2. On August 28, 2015 I served Notices of Deposition together with Subpoena Duces Tecum and Attachment A by personal delivery to the following deponents:

Choon Ok Rhee  
7461 Coca Cola Drive  
Hanover, MD 21076  
Resident Agent for:

- Germantown Plaza  
T/A Lotte Assi Plaza

Tareica Scarlet, secretary to  
Mark Olinger  
3833 Farragut Ave.  
Kensington, MD 20895  
Resident Agent for:

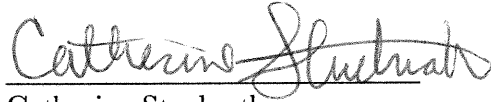
- Longmead Crossing Condominium  
c/o Summit Management Services,  
Inc.

Kiddy Asfaw, Receptionist for  
Arnold J. Kohn, Esquire,  
The Tower Companies  
2000 Tower Oaks Blvd.  
Rockville, MD 20852

- Blair Shopping Center  
c/o Blair Towers, LLLP

3. A copy of the process for each deponent is attached hereto.
4. I do solemnly swear under the penalties of perjury that the statements made herein are true to the best of my knowledge, information and belief.

Date: 08-31-15



Catherine Stuckrath  
102 W. Pennsylvania Ave. Suite 402  
Towson, MD 21204  
410-825-2300

**CERTIFICATE OF SERVICE**

I hereby certify, this 31<sup>st</sup> day of August 2015 that I served a copy of the foregoing

Affidavit of Service via first class mail, postage prepaid on:

Ronald S. Canter  
The Law Offices of Ronald S. Canter, LLC  
200A Monroe Street, Suite 104  
Rockville, Maryland 20850

Fredric J. Einhorn  
77 S. Washington Street, Suite 206  
Rockville, MD 20850



Richard S. Gordon



**CIRCUIT COURT FOR MONTGOMERY COUNTY**  
 50 Maryland Avenue, Rockville, Maryland 20850  
 Phone: (240) 777-9400 Maryland Relay call: 711  
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND  
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING  
 Plaintiff Defendant

TO: Germantown Plaza t/a Lotte Assi Plaza

Issue Date: 08/26/2015

Name  
7461 Coca Cola Drive

Service Deadline: **60 days after Issue Date.**

Address  
Hanover, MD 21076

**SUBPOENA**

City, County, State, Zip

You are hereby compelled to appear at a  court proceeding  deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or  p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: \_\_\_\_\_

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By  
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name  
(410) 825-2300

Address

Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

- If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.
- If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

**Barbara H. Meiklejohn, Clerk**  
**Circuit Court for Montgomery County**

**NOTICE:**

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

**RETURN OF SERVICE**

I certify that I delivered the original of this Subpoena to the following person(s): \_\_\_\_\_  
 on the following date: \_\_\_\_\_ by the following method (specified as required by Rule 2-126): \_\_\_\_\_

Signature

Printed Name

## ATTACHMENT A

### **DOCUMENTS TO BE PRODUCED UNDER SUBPOENA**

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.  
On His Own Behalf and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

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

Defendant.

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.  
\* Case No. 403885-V  
\* Hon. Ronald B. Rubin  
\* Specially Assigned  
\* TRACK VI

\* \* \* \* \*

**NOTICE OF DEPOSITION OF GERMANTOWN PLAZA**  
**WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Germantown Plaza t/a Lotte Assi Plaza  
c/o Rhee Bros., Inc.  
Serve on: Choon Ok Rhee  
7461 Coca Cola Drive  
Hanover, MD 21076

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

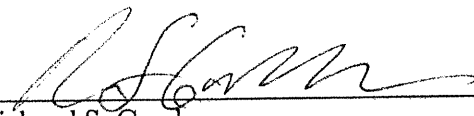
**Attachment A.**

Dated: August 28, 2015

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 Ave., St. 402  
Baltimore, Maryland 21204  
(410) 825-2300  
(410) 825-0066 (facsimile)

**Attorneys for Named Plaintiff and the Class**

By:

  
Richard S. Gordon

**CERTIFICATE OF SERVICE**

I hereby certify, this 28<sup>th</sup> day of August 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter  
The Law Offices of Ronald S. Canter, LLC  
200A Monroe Street, Suite 104  
Rockville, Maryland 20850

Fredric J. Einhorn  
77 S. Washington Street, Suite 206  
Rockville, MD 20850

  
Richard S. Gordon

## ATTACHMENT A

### **DOCUMENTS TO BE PRODUCED UNDER SUBPOENA**

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY

50 Maryland Avenue, Rockville, Maryland 20850
Phone: (240) 777-9400 Maryland Relay call: 711
Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Longmead Crossing Condominium

Issue Date: 08/26/2015

Service Deadline: 60 days after Issue Date.

Name
3833 Farragut Ave.

SUBPOENA

Address
Kensington, MD 20895

City, County, State, Zip

You are hereby compelled to appear at a [ ] court proceeding [X] deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

[X] a.m. or [ ] p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

[ ] To testify in the above case, and/or

[X] To produce the following documents, items, and information, not privileged: Please see Attachment A.

[ ] To produce, permit inspection and copying of the following documents or other tangible items:

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

[ ] If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

[ ] If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Signature of Barbara H. Meiklejohn

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

- 1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s):
on the following date: by the following method (specified as required by Rule 2-126):

Signature

Printed Name



## ATTACHMENT A

### **DOCUMENTS TO BE PRODUCED UNDER SUBPOENA**

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.

2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.  
On His Own Behalf and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

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

Defendant.

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.  
\* Case No. 403885-V  
\* Hon. Ronald B. Rubin  
\* Specially Assigned  
\* TRACK VI

\* \* \* \* \*

**NOTICE OF DEPOSITION OF LONGMEAD CROSSING CONDOMINIUM  
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Longmead Crossing Condominium  
c/o Summit Management Services, Inc.  
Serve on: Mark Olinger  
3833 Farragut Ave.  
Kensington, MD 20895

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

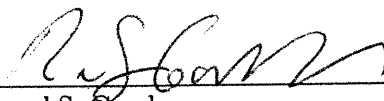
**Attachment A.**

Dated: August 28, 2015

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 Ave., St. 402  
Baltimore, Maryland 21204  
(410) 825-2300  
(410) 825-0066 (facsimile)

**Attorneys for Named Plaintiff and the Class**

By:


  
Richard S. Gordon

**CERTIFICATE OF SERVICE**

I hereby certify, this 28<sup>th</sup> day of August 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter  
The Law Offices of Ronald S. Canter, LLC  
200A Monroe Street, Suite 104  
Rockville, Maryland 20850

Fredric J. Einhorn  
77 S. Washington Street, Suite 206  
Rockville, MD 20850

  
Richard S. Gordon

## ATTACHMENT A

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1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



**CIRCUIT COURT FOR MONTGOMERY COUNTY**  
 50 Maryland Avenue, Rockville, Maryland 20850  
 Phone: (240) 777-9400 Maryland Relay call: 711  
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND  
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Blair Shopping Center, LLLP

Issue Date: 08/26/2015

Name  
 11501 Huff Court

Service Deadline: **60 days after Issue Date.**

Address  
 N. Bethesda, MD 20895

**SUBPOENA**

City, County, State, Zip

You are hereby compelled to appear at a  court proceeding  deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or  p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: \_\_\_\_\_

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By  
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name  
(410) 825-2300

Address  
Towson, Maryland 21204

Phone

City, State, Zip

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If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

**Barbara H. Meiklejohn, Clerk**  
**Circuit Court for Montgomery County**

**NOTICE:**

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 on the following date: \_\_\_\_\_ by the following method (specified as required by Rule 2-126): \_\_\_\_\_

Signature

Printed Name

## ATTACHMENT A

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QUAN-EN YANG, et al.  
On His Own Behalf and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

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

Defendant.

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.  
\* Case No. 403885-V  
\* Hon. Ronald B. Rubin  
\* Specially Assigned  
\* TRACK VI

\* \* \* \* \*

**NOTICE OF DEPOSITION OF BLAIR SHOPPING CENTER, LLLP**  
**WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Blair Shopping Center, LLLP  
c/o Blair Towers, LLLP  
Serve on: Arnold J. Kohn, Esquire,  
The Tower Companies  
11501 Huff Court  
N. Bethesda, MD 20895

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

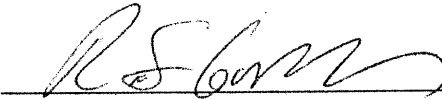
**Attachment A.**

Dated: August 28, 2015

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 Ave., St. 402  
Baltimore, Maryland 21204  
(410) 825-2300  
(410) 825-0066 (facsimile)

**Attorneys for Named Plaintiff and the Class**

By:

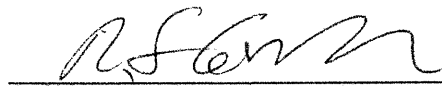
  
Richard S. Gordon

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200A Monroe Street, Suite 104  
Rockville, Maryland 20850

Fredric J. Einhorn  
77 S. Washington Street, Suite 206  
Rockville, MD 20850

  
Richard S. Gordon



## ATTACHMENT A

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