



Richard S. Gordon
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October 27, 2015

By Electronic Mail

Honorable Ronald B. Rubin
Circuit Court for Montgomery County
50 Maryland Avenue
Rockville, Maryland 20850

Re: *Yang, et al. v. G&C Gulf, Inc. dba G&G Towing*
Case No. 403885V

Dear Judge Rubin:

I write to you on behalf of all Parties in the above referenced action. Yesterday, the Plaintiffs and Defendants participated in mediation and, with the assistance of the Honorable Irma Raker, reached a tentative settlement. As is sometimes the case in class actions, the proposed settlement is more involved than simply the funding of a common fund for the benefit of the Class. Although the Parties have confidence that the proposed terms of settlement are fair, adequate and reasonable under Md. Rule 2-231, counsel for the Parties would like the opportunity to meet with Your Honor informally, in chambers, to update you on the protocol that we have agreed to and to seek the Court's guidance on how to proceed going forward. If at all possible, counsels' preference is to meet with Your Honor either later this week or next.

Thank you for your consideration of this matter and we look forward to hearing from you.

Respectfully,

Richard S. Gordon

RSG/cs

cc: Ronald Canter (by Electronic Mail)
J. Fredric Einhorn (by Electronic Mail)