

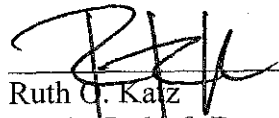
IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG, *et al.* :
Plaintiffs, :
v. : Case No. 403885-V
G&C GULF, INC., *et al.* :
Defendant. :

CERTIFICATE REGARDING DISCOVERY

I HEREBY CERTIFY that on this 31st day of August, 2015 I served on all counsel hereto, by mail, first-class, postage prepaid, a copy of Montgomery Meadows Homeowners Association, Inc.'s, Response to Plaintiff's Subpoena and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.

Respectfully submitted,


Ruth G. Katz
Lerch, Early & Brewer, Chtd.
3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
(301) 986-1300
*Counsel for Montgomery Meadows
Homeowners Association, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of August, 2015, a copy of the foregoing Certificate Regarding Discovery was served via first-class mail, postage prepaid, to:

Richard S. Gordon, Esq.
102 West Pennsylvania Avenue
Suite 402
Baltimore, Maryland 21204
Counsel for Plaintiffs

Ronald S. Canter, Esq.
Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Counsel for Defendant G & G Gulf, Inc.

Frederic J. Einhorn, Esq.
27 West Jefferson Street, Suite 204
Rockville, Maryland 20850
Counsel for Defendant Glenn W. Cade, Jr.


Ruth O. Katz

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG, *et al.* :
Plaintiffs, :
v. : Case No. 403885-V
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Defendant. :

MONTGOMERY MEADOWS HOMEOWNERS ASSOCIATION, INC.'S
RESPONSE TO PLAINTIFFS' SUBPOENA

Montgomery Meadows Homeowners Association, Inc. ("Association"), by and through its undersigned counsel, submits the following in response to Plaintiffs' subpoena:

Subpoena Request 1: For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but 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.

Response: Pursuant to the Court's Order dated August 19, 2015, no answer needs to be furnished in response to this request.

Subpoena Request 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 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.

Response: Please see attached all responsive documents thereto. The Association reserves the right to supplement its response should additional information become available.

Respectfully submitted,



Ruth O. Katz
Lerch, Early & Brewer, Chtd.
3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
(301) 986-1300

*Counsel for Montgomery Meadows
Homeowners Association, Inc.*

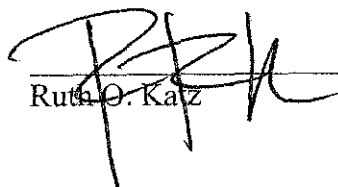
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of August, 2015, a copy of the foregoing Montgomery Meadows Homeowners Association, Inc.'s Response to Plaintiffs' Subpoena was served via first-class mail, postage prepaid, to:

Richard S. Gordon, Esq.
102 West Pennsylvania Avenue
Suite 402
Baltimore, Maryland 21204
Counsel for Plaintiffs

Ronald S. Canter, Esq.
Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Counsel for Defendant G & G Gulf, Inc.

Frederic J. Einhorn, Esq.
27 West Jefferson Street, Suite 204
Rockville, Maryland 20850
Counsel for Defendant Glenn W. Cade, Jr.


Ruth O. Katz

From: Joselyn Wells <josie@communityassn.com>
Sent: Wednesday, March 25, 2015 9:28 AM
To: G&G Towing
Subject: Montgomery Meadows

Brian,

Please do not tow the trailer parked in the circle on Knoll Mist until after the 30th of June 2015. It is my understanding that they will be doing a significant retrofit of the under ground Pepco wiring in Montgomery Meadows.

Joselyn Wells
www.communityassn.com
josie@communityassn.com
301-258-7711 x150
Fax: 301-258-8362

Time 8:40 AM
Make of Car Honda Civic
License No. 3V9252T
Color Blue
Location 1006 Travis
Reason Exp Tags
REMOVED: Yes No
Date
Time

Time 8:30
Make of Car BMW 5 Series
License No. 4CFW59
Color Burg
Location 1001 Travis Ln
Reason Flat tire / Exp Tag
REMOVED: Yes No
Date
Time

Time 1:30 AM
Make of Car Buick Rendezvous
License No. 2AWL122
Color Burg
Location 1000 Travis Ln
Reason Flat tire
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 9:00 AM
Make of Car Chevy Corolla
License No. 2HP 37
Color Pink
Location 1111 Southwest
Reason Exp Tags
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 8:50 AM
Make of Car Subaru
License No. 4BGF68
Color Burg
Location 1025 Southwest
Reason Flat tire
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 6:55 AM
Make of Car BMW 335
License No. 2AS5802
Color Blue
Location 1200 Knoll
Reason Exp Tag
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 9:00 AM
Make of Car Chevy Blazer
License No. 8BN 9406
Color Green
Location 1112 Travis Ln
Reason Exp / Inop
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 8:40 AM
Make of Car BMW 328i
License No. NONE
Color White
Location 108 Gmta
Reason No Tags / Flat tire
REMOVED: Yes No
Date
Time

Date 5/17/2015
Time 9:00 AM
Make of Car Toyota Corolla
License No. 1AN 8634
Color Red
Location 1112 Travis Ln
Reason Exp Tags
REMOVED: Yes No
Date
Time



Joselyn Wells

www.communityassn.com

josie@communityassn.com

301-258-7711 x150

Fax: 301-258-8362