

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

Plaintiffs,

vs.

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

and

BRUCE PATNER t/a  
PATNER PROPERTIES,  
On His Own Behalf and on Behalf  
of All Others Similarly Situated

Defendants.

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

\* \* \* \* \*

**CONSENT MOTION TO EXTEND TIME TO MAIL  
NOTICE TO THE MEMBERS OF THE DEFENDANT CLASS  
UNDER ADMINISTRATIVE ORDER NO. 2**

Named Plaintiffs Quan-en Yang, Mary Lois Pelz and Darcy Pelz-Butler on behalf of the certified Plaintiff Class in this case, with the consent of Defendants, move the Court to extend the deadline set forth in Administrative Order No. 2 for mailing notice to the members of the certified Defendant Class by Thirty (30) days, and state as follows:

1. On March 13, 2017, this Court entered Administrative Order No. 2 which includes the protocol and procedure for mailing the Court approved Notice to the certified Defendant Class in this case. Dkt. No. 240.
2. Paragraph 6(A) of Administrative Order no. 2 requires that the Notice “shall be sent under the direction of Plaintiffs’ Class Counsel to all Defendant Class members within Thirty (30) days of the entry of this Administrative Order No. 2.” Thus, the current deadline for mailing the Notice is April 12, 2017.

3. Recently, Counsel for the Plaintiff and Defendant Classes resumed settlement negotiations with the assistance of The Honorable James Eyler and believe that a short extension on the mailing of the Notice to the Defendant Class will facilitate those discussions. The request does not affect the trial date in this matter.

4. Accordingly, an extension of Thirty (30) additional days to mail the Notice is requested. If granted, the new deadline for mailing the Notice will be **May 12, 2017**.

5. Plaintiffs have provided a copy of this Motion to counsel for the Defendant Class who join in the request and consent to the Motion.

WHEREFORE, Plaintiffs respectfully request that the Court extend the deadline for mailing notice to the members of the certified Defendant Class by thirty days to **May 12, 2017**.

Respectfully submitted,

Dated: April 7, 2017

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Attorneys for Named Plaintiffs and  
the Certified Plaintiff Class

By:

  
Richard S. Gordon

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of April, 2017, I served the foregoing Consent Motion to Extend Time to Mail Notice to the Members of the Defendant Class Under Administrative Order No. 2, and proposed Order, by electronic mail and first-class mail, postage prepaid on:

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Richard S. Gordon

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\*

\* \* \* \* \*

**ORDER**

UPON CONSIDERATION OF the Consent Motion to Extend Time to Mail Notice to the Members of the Defendant Class Under Administrative Order No. 2, and for good cause shown, it is this \_\_\_\_ day of April, 2017,

ORDERED that the Consent Motion is hereby GRANTED,

IT IS FURTHER ORDERED that the deadline for mailing the Notice to the certified Defendant Class is extended by Thirty (30) days, making the revised deadline for mailing the Notice **May 12, 2017**.

\_\_\_\_\_  
Honorable Ronald B. Rubin