

QUAN-EN YANG, *et al.*,

*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
*

* * * * *

**MOTION TO EXTEND TIME TO RESPOND
TO DEFENDANT BRUCE PATNER'S MOTION TO DISMISS**

Plaintiffs move to extend the time to respond to Defendant Bruce Patner's Motion to Dismiss by 15 days until October 18, 2016.

Defendant Patner filed a motion to dismiss the Fourth Amended Complaint on September 15, 2016, making Plaintiffs' response due on or before October 3, 2016. Defendants also served their opposition to Plaintiffs' Motion for Class Certification of the Defendant Class on September 16, 2016. Under the Court's amended briefing schedule (Doc. # 202, September 21, 2016), Plaintiffs' reply on class certification is due on October 18, 2016.

The Defendants raise overlapping arguments in both the motion to dismiss and the opposition to class certification. Although not identical, Plaintiffs will need to coordinate

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Clerk of the Circuit Court
Montgomery County, MD

briefing in order to efficiently make comprehensive arguments in response. It is most efficient to submit both briefs at the same time.

Plaintiffs' counsel requested from James Ulwick, lead counsel for Defendant Patner and the putative defendant class, consent to this motion. Mr. Ulwick informed that he would check with co-counsel and get back to Plaintiffs. As of the filing of this Motion, Plaintiffs have received no response.

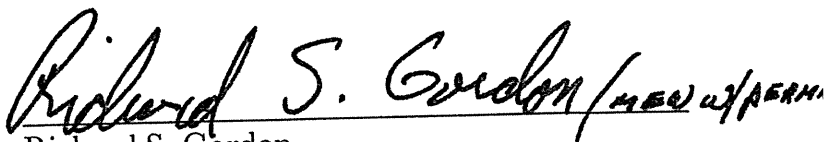
WHEREFORE, Plaintiffs request an extension of time in which to file the response to Defendant Patner's motion to dismiss to coincide with the reply on class certification, October 18, 2016, and for such further relief that Court deems appropriate.

Respectfully submitted,

Dated: September 30, 2016

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Attorneys for Named Plaintiff and the Class

By: 
Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 30th day of September, 2016, that I served a copy of the foregoing Motion to Extend Time to Respond to Defendant Bruce Patner's Motion to Dismiss, by first-class mail, postage pre-paid, on:

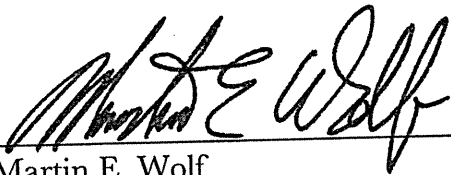
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