

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.

* * * * *

**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 an additional Four (4) weeks, 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."

3. Because Counsel for the Plaintiff and Defendant Classes had resumed settlement negotiations with the assistance of The Honorable James Eyler, and believed that a short extension on the mailing of the Notice to the Defendant Class would facilitate those discussions, the Parties have three times before requested and the Court approved extensions of the mailing period. See Dkt. Nos. 247, 250, 252. Under the Court's Order, entered on June 19, 2017, the current deadline for mailing the Notice is July 3, 2017. Dkt. No. 252.

4. The Parties are continuing to discuss settlement and, over the past Three (3) weeks, have exchanged additional drafts of the proposed settlement Term Sheet and met with Judge Eyler. The Parties continue to make progress on what is proving to be a complex settlement protocol. However, because the Parties have not yet reached a complete agreement but wish to continue settlement talks, Judge Eyler has proposed that the Parties request an additional Four (4) week extension on the deadline for mailing Notice to the Defendant Class.

5. Accordingly, an extension of Four (4) weeks to mail the Notice is requested. If granted, the new deadline for mailing the Notice will be **July 31, 2017**. Unless a settlement is reached, however, Plaintiffs do not anticipate requesting any further extension of time to send Notice to the Defendant Class.

6. 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 Four (4) week to **July 31, 2017**.

Respectfully submitted,

Dated: June 30, 2017

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Attorneys for Named Plaintiffs and
the Certified Plaintiff Class.

By:


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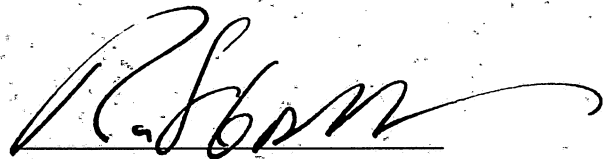
CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 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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