

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

Plaintiff,

vs.

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

Defendant.

* * * * *

IN THE

CIRCUIT COURT

FOR

MONTGOMERY COUNTY, MD.

Case No. 403885-V

Hon. Ronald B. Rubin
Specially Assigned
TRACK VI

AFFIDAVIT OF SERVICE

I, Catherine Stuckrath, state as follows:

1. I am a competent person over the age of eighteen and not a party to the case.
2. On July 9, 2015 I served Notices of Deposition together with Subpoena Duces Tecum and Attachment A by personal delivery to the following deponents:

Melissa King, Secretary to
Bradley S. Glaser
1500 Serpentine Road, Suite 100
Baltimore, MD 21209
Resident Agent for:

- Scenery Point Condo c/o Vanguard Management Services, Inc.
- Fountain Hills Condominium Assoc. c/o Vanguard Management Services, Inc.

Glenna Bendit, Secretary to
Louis Joseph Ianquinta
3416 Olandwood Court, Suite 210
Olney, MD 20832
Resident Agent for:

- Columbia Towers Condo c/o Iko Real Estate, Inc.

Katelyn Gowling, Secretary
1055 1st St. Suite 200
Rockville, MD 20850
Resident Agent for:

- HBW Group

Ana Dina, Secretary to
Richard C. Stang
Deleon & Stang, CPAS
100 Lakeforest Blvd. Suite 650
Gaithersburg, MD 20877
Resident Agent for:

- Leesborough HOA

Allie Karta, Secretary to
Jack Garson
7910 Woodmont Ave., Suite 650
Bethesda, MD 20814
Resident Agent for:

- Westmore Auto Park I c/o
Westmore Commercial Condo
Association, Inc.

Floria Andrews, Secretary to
Leon Andris
10701 Venetia Mill Cr.
Silver Spring, MD 20901
Resident Agent for:

- Burnt Mills Crossing

Alejandra Quintanilla, Secretary to
Kathy Drury
20440 Century Blvd., Suite 100
Germantown, MD 20874
Resident Agent for:


- Gunners View HOA c/o The
Management Group Associates,
Inc.

Sean Mullens, Secretary to
Richard M. Heger
6931 Arlington Road, Suite 500
Bethesda, MD 20814
Resident Agent for:

- Harvey Property Management
Company, Inc. - Flower Avenue
Shopping Center

3. A copy of the process for each deponent is attached hereto.
4. I do solemnly swear under the penalties of perjury that the statements made herein are true to the best of my knowledge, information and belief.

Date: 07-13-15


Catherine Stuckrath
102 W. Pennsylvania Ave. Suite 402
Towson, MD 21204
410-825-2300

CERTIFICATE OF SERVICE

I hereby certify, this 13th day of July 2015 that I served a copy of the foregoing Affidavit of Service via first class mail, postage prepaid on:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

A handwritten signature in black ink, appearing to read 'RSGordon', written over a horizontal line.

Richard S. Gordon



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Fountain Hills Condominium Assoc.

Issue Date: 07/06/2015

Name

Service Deadline: 60 days after Issue Date.

1500 Serpentine Road, Suite 100

SUBPOENA

Address

Baltimore, MD 21209

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On August 10, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By

Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name

Address

(410) 825-2300

Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk

Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.

QUAN-EN YANG, et al.	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	
Plaintiff,	*	FOR
vs.	*	MONTGOMERY COUNTY, MD.
G & C GULF, INC. d/b/a	*	Case No. 403885-V
G&G TOWING	*	
Defendant.	*	Hon. Ronald B. Rubin
	*	Specially Assigned
	*	TRACK VI

* * * * *

**NOTICE OF DEPOSITION OF FOUNTAIN HILLS CONDOMINIUM ASSOC.
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Fountain Hills Condominium Assoc.,
C/O Vanguard Management Services, Inc.
Serve on: Bradley S. Glaser
1500 Serpentine Road, Suite 100
Baltimore, MD 21209

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By: 
Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

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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.

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.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Scenery Point Condo

Issue Date: 07/06/2015

Name

Service Deadline: 60 days after Issue Date.

1500 Serpentine Road, Suite 100

SUBPOENA

Address

Baltimore, MD 21209

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On August 10, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By

Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name

Address

(410) 825-2300

Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.
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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF SCENERY POINT CONDO
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Scenery Point Condo, C/O Vanguard
Management Services, Inc.
Serve on: Bradley S. Glaser
1500 Serpentine Road, Suite 100
Baltimore, MD 21209

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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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.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

Plaintiff

TO: HBW Group

Name

1055 First St., Suite 200

Address

Rockville, MD 20850

City, County, State, Zip

vs. G&C GULF d/b/a G&G TOWING

Defendant

Issue Date: 07/06/2015

Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

Address of court or other location

On August 10, 2015

Date

at 10:00

Time

a.m. or p.m.

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

Requested By

Richard S. Gordon

Name

(410) 825-2300

Phone

requested issuance of this subpoena. Questions should be referred to:

102 W. Pennsylvania Ave. Suite 402

Address

Towson, Maryland 21204

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
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4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

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 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

NOTICE OF DEPOSITION OF HBW GROUP
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of HBW Group
Serve on: HBW Group
1055 First St., Suite 200
Rockville, Maryland 20850

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

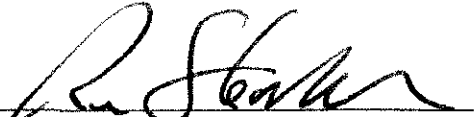
By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Westmore Auto Park I

Issue Date: 07/06/2015

Name

1390 Piccard Drive, Suite 120

SUBPOENA

Service Deadline: 60 days after Issue Date.

Address

Rockville, MD 20850

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On August 10, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By

Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name

Address

(410) 825-2300

Towson, Maryland 21204

Phone

City, State, Zip

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If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk

Circuit Court for Montgomery County

NOTICE:

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Signature

Printed Name

ATTACHMENT A

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF WESTMORE AUTO PARK I
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Westmore Auto Park I, C/O Westmore
Commercial Condo Association, Inc.
Serve on: Jack Garson
7910 Woodmont Ave., Suite 650
Bethesda, MD 20814

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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CIRCUIT COURT FOR MONTGOMERY COUNTY
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Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

Plaintiff

TO: Gunners View HOA

Name

20440 Century Blvd., Suite 100

Address

Germantown, MD 20874

City, County, State, Zip

vs. G&C GULF d/b/a G&G TOWING

Defendant

Issue Date: 07/06/2015

Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

Address of court or other location

On August 10, 2015

Date

at 10:00

Time

a.m. or p.m.

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

Requested By

Richard S. Gordon

Name

(410) 825-2300

Phone

requested issuance of this subpoena. Questions should be referred to:

102 W. Pennsylvania Ave. Suite 402

Address

Towson, Maryland 21204

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF GUNNERS VIEW HOA
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Gunners View HOA, C/O The
Management Group Associates, Inc.
Serve on: Kathy Drury
20440 Century Blvd., Suite 100
Germantown, MD 20874

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Harvey Property Management Company Inc.

Issue Date: 07/06/2015

Name

Service Deadline: 60 days after Issue Date.

6931 Arlington Rd., Suite 500

SUBPOENA

Address

Bethesda, MD 20814

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On August 10, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By

Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name

Address

(410) 825-2300

Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk

Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____

on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.
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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF HARVEY PROPERTY MANAGEMENT COMPANY, INC.
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Harvey Property Management Company,
Inc. – Flower Avenue Shopping Center
Serve on: Richard M. Heger
6931 Arlington Road, Suite 500
Bethesda, MD 20814

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.
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.



CIRCUIT COURT FOR MONTGOMERY COUNTY

50 Maryland Avenue, Rockville, Maryland 20850
Phone: (240) 777-9400 Maryland Relay call: 711
Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
or

QUAN-EN YANG

Plaintiff

TO: Columbia Towers Condo

Name

3416 Olandwood Court, Suite 210

Address

Olney, MD 20832

City, County, State, Zip

vs. G&C GULF d/b/a G&G TOWING

Defendant

Issue Date: 07/06/2015

Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a [] court proceeding [X] deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

Address of court or other location

On August 10, 2015

Date

at 10:00

Time

[X] a.m. or [] p.m.

Silver Spring, Maryland 20910

City, State, Zip

[] To testify in the above case, and/or

[X] To produce the following documents, items, and information, not privileged: See Attachment A.

[] To produce, permit inspection and copying of the following documents or other tangible items:

Plaintiff: Quan-En Yang

Requested By

Richard S. Gordon

Name

(410) 825-2300

Phone

requested issuance of this subpoena. Questions should be referred to:

102 W. Pennsylvania Ave. Suite 402

Address

Towson, Maryland 21204

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

- [] If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.
[] If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Handwritten signature of Barbara H. Meiklejohn

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

- 1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s):
on the following date: by the following method (specified as required by Rule 2-126):

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF COLUMBIA TOWERS CONDO
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Columbia Towers Condo C/O Iko Real Estate, Inc.
Serve on: Louis Joseph Ianquinta
3416 Olandwood Court, Suite 210
Olney, MD 20832

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.
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.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

Plaintiff

TO: Burnt Mills Crossing, LLC

Name

10701 Venetia Mill Ct.

Address

Silver Spring, MD 20901

City, County, State, Zip

vs. G&C GULF d/b/a G&G TOWING

Defendant

Issue Date: 07/06/2015

Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

Address of court or other location

On August 10, 2015

Date

at 10:00

Time

a.m. or p.m.

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

Requested By

Richard S. Gordon

Name

(410) 825-2300

Phone

requested issuance of this subpoena. Questions should be referred to:

102 W. Pennsylvania Ave. Suite 402

Address

Towson, Maryland 21204

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk

Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.
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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF BURNT MILLS CROSSING, LLC
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Burnt Mills Crossing, LLC
Serve on: Leon W. Andris
8030 Woodmont Ave., Suite 300
Bethesda, MD 20814

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

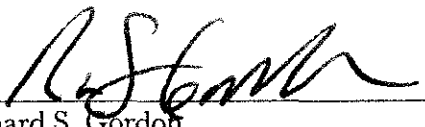
Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9th day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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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.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff
 TO: Leesborough HOA, Inc.

Defendant

Issue Date: 07/01/2015

Service Deadline: 60 days after Issue Date.

Name
1300 Spring St. Suite 201

SUBPOENA

Address
Silver Spring, MD 20910
 City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On August 10, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: See Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do not have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to August 10, 2015.

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If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
 Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
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3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

NOTICE OF DEPOSITION OF LEESBOROUGH HOA, INC.
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Leesborough HOA, Inc.
Serve on: Richard C. Stang
Deleon & Stang, CPAS
100 Lakeforest Blvd., Suite 650
Gaithersburg, MD 20877

DATE: August 10, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as


Attachment A.

Dated: July 9, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 9nd day of July 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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.

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.