

QUAN-EN YANG, <i>et al</i> ,	*	IN THE
On their own Behalf and on Behalf	*	CIRCUIT COURT FOR
of All Others Similarly Situated,	*	MONTGOMERY COUNTY, MD
Plaintiffs,	*	
v.	*	Case No. 403885V
	*	TRACK VI
G & C GULF, INC. d/b/a	*	
G&G TOWING, et al.	*	Hon. Ronald B. Rubin,
and	*	Specially Assigned
	*	
BRUCE PATNER t/a	*	
PATNER PROPERTIES,	*	
On His Own Behalf and on Behalf	*	
of All Others Similarly Situated,	*	
Defendants.	*	
* * * * *		

PLAINTIFFS’ MOTION TO SHORTEN TIME REQUIREMENTS

Plaintiffs, by and through their undersigned Plaintiff Class Counsel, respectfully move this Court pursuant to Md. Rule 1-204 to shorten the time for Justin Cameron (“Mr. Cameron”) to respond to Plaintiffs’ Motion for Sanctions Under Md. Rule 1-341 and for Other Relief Under Md. Rule 2-231(g) Against Justin Cameron, Counsel for Defendant Longmead Crossing Condominium and Request for Hearing (“Motion for Sanctions”). In support thereof, Plaintiffs state as follows:

1. On October 12, 2020, Plaintiffs filed their Motion for Sanctions against Mr. Cameron for his bad faith and lack of substantial justification in threatening to sue Plaintiff Class Counsel personally if Plaintiffs did not agree to accept a drastically reduced settlement for Longmead members of the Plaintiff Class.

2. As detailed in Plaintiffs Motion for Sanctions, Mr. Cameron attempts to put

Plaintiff Class Counsel in a conflict of interest with the Plaintiff Class by filing claims against Plaintiff Class Counsel that are completely unfounded and ill-conceived.

3. Plaintiffs are prejudiced by the threats used by Mr. Cameron to coax Plaintiffs to settle this case. The disingenuous nature of Mr. Cameron's actions requires an immediate explanation and ruling from the Court. Otherwise, if Mr. Cameron is permitted to move forward, unchecked, litigation could be unnecessarily prolonged and muddled by frivolous claims.

4. Trial for this matter is currently scheduled for ten days and set to begin on February 1, 2021. The short timeframe necessitates an immediate review of this matter. Fairness dictates that the time for Longmead to respond to Plaintiffs' Motion for Sanctions be shortened to 5pm, October 15, 2020.

WHEREFORE, the Plaintiffs request that the Court order Mr. Cameron to respond to Plaintiffs' Motion for Sanctions no later than 5pm, October 15, 2020.

Respectfully submitted,

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*Attorneys for Named Plaintiffs and
the Certified Plaintiff Class*



By:

Sara E. Assaid

CERTIFICATE OF SERVICE

I hereby certify, this 12th day of October, 2020, a copy of the foregoing Plaintiffs' Motion to Shorten Time Requirements and proposed Order was served via e-mail (per the agreement of counsel) or by first class mail, postage prepaid on the following:

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