

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 an additional Three (3) 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 twice before requested and the Court approved extensions of the mailing period. *See* Dkt. Nos. 247 and 250. Under the Court's most recent Order, entered on May 12, 2017, the current deadline for mailing the Notice is June 12, 2017.

4. The Parties are continuing to discuss settlement and, over the past Thirty (30) days, have exchanged several drafts of the proposed settlement Term Sheet and met face-to-face. The Parties have made some significant 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 Three (3) week extension on the deadline for mailing notice to the Defendant Class.

5. Accordingly, an extension of Three (3) weeks to mail the Notice is requested. If granted, the new deadline for mailing the Notice will be **July 3, 2017**.

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 Three (3) week to **July 3, 2017**.

Respectfully submitted,

Dated: June 12, 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 12th 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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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 June, 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 an additional Three (3) weeks, making the revised deadline for mailing the Notice **July 3, 2017**.

Honorable Ronald B. Rubin