

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

* * * * *

**DECLARATION OF JOSEPHINE BRAVATA CONCERNING THE MAILING OF THE
POSTCARD NOTICE**

I, Josephine Bravata, declare as follows:

1. I submit this declaration in order to provide the Court and the parties to the above-captioned litigation with information regarding the mailing of the Postcard Notice. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein. See a copy of the Postcard Notice attached as Exhibit A.

2. I am the Quality Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized claims administration firm. I have over fourteen years of experience specializing in administration of class action cases. SCS was established in April 1999 and has administered over three-hundred twenty-five (325) class action cases since its inception.

3. SCS was appointed as the Escrow Administrator in the above-captioned litigation. Our services include the searching TransUnion and LexisNexis for vehicle owners at the time of the tow by the Vehicle Identification Number, License Plate and State registered; performing skip traces with TransUnion and LexisNexis to obtain the most current addresses; organizing the printing and mailing of Postcard Notices to class members; setting-up and updating a database

listing the names and addresses of class members and updating addresses as needed; re-mailing Postcard Notices returned with forwarding addresses; recording all returned Postcard Notices as undeliverable with no forwarding addresses; tracking exclusion requests; and handling all correspondence related to the above procedures.

4. SCS received from Class Counsel two lists of tow records that contained invoicing information, Vehicle Identification Numbers, License Plates, and State registered. This information was used to obtain vehicle owner information at the time the vehicle was released from tow and updated address information about that owner. All records were searched through TransUnion and any that did not produce a result were then searched through LexisNexis. Out of the 25,811 tow records provided, 24,023 were unique, and matches were located for 20,348.


5. So as to providing actual notice to the potential class members, we mailed, by first class mail, the Postcard Notices approved by the Court to 20,348 people whose vehicles, between April 16, 2012 and January 7, 2016 were non-consensually towed by G & C Gulf, Inc. d/b/a G&G Towing from a private Parking Lot. The 20,348 Postcard Notices were mailed on March 4, 2016, as required by the Court's Order dated February 29, 2016 (the "Court's Order").

6. To date, we have received 1,260 Postcard Notices that were returned to us as undeliverable. Of these, 27 were re-mailed Postcard Notices using the forwarding addresses provided to us by the United States postal service. The remaining 1,233 were undeliverable.

7. Class Members who wished to exclude themselves from the Class are required to mail a request for exclusion postmarked no later than April 18, 2016. As of this date, SCS has received no request for exclusion from the Settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of April 2016, in Media, Pennsylvania.



Josephine Bravata

EXHIBIT A

THIS IS NOT JUNK MAIL.

**THIS POSTCARD PROVIDES
IMPORTANT
INFORMATION ABOUT
YOUR LEGAL RIGHTS AS A
POTENTIAL MEMBER OF A
CLASS ACTION.**

G&G Towing Class Action
c/o Strategic Claims Services
P.O. Box 230
Media, PA 19063

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
LANSDALE, PA
PERMIT NO. 491

The Circuit Court for Montgomery County, Maryland authorized this notice
This is not a solicitation from a lawyer

Why am I receiving this notice? You are receiving this notice as a result of an agreement to resolve a class action complaint in *Yang v. G & C Gulf, Inc. d/b/a G&G Towing, et al.*, Case No.: 403885-V, filed in the Circuit Court for Montgomery County, Maryland, commenced by Plaintiff Quan-en Yang (the "Class Representative") on his own behalf and on behalf of all others similarly situated. On January 7, 2016 the Court preliminarily approved an agreement to resolve the class action against G&G Towing only and ordered that this case proceed as a class action. You have been identified as a potential member of the Class. YOUR LEGAL RIGHTS ARE AFFECTED BY THE COURT'S ORDER PRELIMINARILY APPROVING THE AGREEMENT AND CERTIFYING THE CLASS.

What Is The Lawsuit About? The Class Representative claims that G&G Towing – acting under contracts with Parking Lot Owners, Managers and/or Agents throughout Montgomery County – engaged in purported aggressive towing of vehicles that violated duties set forth in Maryland's Towing or Removal of Vehicles from Parking Lots Law (Md. Code Ann., Transp. §21-10A-01 *et seq.* (the "Maryland Towing Act")), Montgomery County's Tow Ordinances (Montgomery County Code, § 30C-1, *et seq.* (the "MC Tow Law")) and the common law of Maryland.

Why Was This Notice Sent To You? The Defendants' records show that you are a Class Member in this case because, between April 16, 2012 and January 7, 2016, your vehicle was towed by G&G Towing from a private parking lot in Montgomery County, Maryland. The tow was involuntary; that is, you did not request that G&G Towing tow your vehicle.

Where can I get more information? The website www.TowingClassAction.com includes additional information about this lawsuit including the Court's Order Preliminarily Approving the Agreement and Certifying the Class, the Amended Complaint that the Plaintiffs submitted, and the Defendants' Answer to the Complaint. You may also speak to one of the lawyers by calling 410-825-2300, or by writing to: G&G Towing Class Counsel, c/o Gordon, Wolf & Carney, Chtd., 102 West Pennsylvania Avenue, Suite 402, Towson, Maryland 21204

CERTIFICATE OF SERVICE

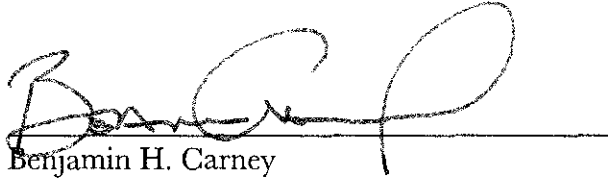
I hereby certify, this 22nd day of April, 2016, that I served a copy of the foregoing Declaration of Josephine Bravata Concerning the Mailing of the Postcard Notice, by first-class mail, postage pre-paid, to:

Ronald S. Canter, Esq.
Law Offices of Ronald S. Canter, LLC
200A Monroe St., Suite 104
Rockville, MD 20850

Attorney for G&C Gulf, Inc.

Frederic J. Einhorn, Esq.
27 West Jefferson Street, Suite 204
Rockville, MD 20850

Attorney for Glen Cade, Jr.



Benjamin H. Carney