

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

Plaintiffs,

vs.

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

Defendants.

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

* * * * *

JOINT MOTION FOR THIRTY-DAY STAY TO FACILITATE MEDIATION

Plaintiff, Quan-en Yang, and Defendants, G&C Gulf, Inc. and Glenn W. Cade, Jr. (collectively, the “Parties”), jointly move for a thirty-day stay of all proceedings in this case to facilitate mediation.

The Parties previously engaged in a mediation session which was productive but did not result in a resolution of this case. At this time, the Parties believe that further mediation is appropriate, and are in the process of scheduling another mediation session in the near future. The Parties desire to focus their resources which are currently devoted to conducting discovery and otherwise litigating this case to the mediation process, and believe that a thirty-day stay of all proceedings would facilitate settlement negotiations.

Accordingly, the parties jointly and respectfully request that: 1) the Court stay this case, including all discovery and briefing in this case, through October 26, 2015; 2) that all pending deadlines in this case, including the deadline for Plaintiff to respond to Defendant G&C Gulf Inc.’s Motion to Deem Customer Contracts Confidential, be extended for thirty days; 3) that the Class Certification Hearing in this case, currently

scheduled for December 29, 2015 at 2:00 p.m., be re-scheduled for February 12, 2016 at 1:30 p.m (currently scheduled as the time for the pre-trial hearing in this case); and, 4) that the pre-trial hearing in this case be re-scheduled to a date thirty days or more following February 12, 2016.

Respectfully submitted,

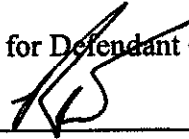
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CERTIFICATE OF SERVICE

I hereby certify, this 23 day of September, 2015 that I served a copy of the foregoing

Joint Motion via electronic and first class mail, postage prepaid on:

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* * * * *

ORDER GRANTING THIRTY-DAY STAY TO FACILITATE MEDIATION

Upon consideration of the Joint Motion for Thirty-Day Stay to Facilitate Mediation in the above-captioned case (the “Joint Motion for Stay”), filed by Plaintiff Quan-en Yang, Defendant G&C Gulf, Inc., and Defendant Glenn W. Cade, Jr. (collectively, the “Parties”), it is this ____ day of _____, 2015, hereby

ORDERED, that the Joint Motion for Stay is granted; and further,

ORDERED, that this case, including all discovery and briefing in this case, is stayed through October 26, 2015; and further,

ORDERED, that all pending deadlines in this case, including the deadline for Plaintiff to respond to Defendant G&C Gulf Inc.’s Motion to Deem Customer Contracts Confidential, are extended for thirty days; and further

ORDERED, that the Class Certification Hearing in this case is re-scheduled for February 12, 2016 at 1:30 p.m; and further,

ORDERED, that that the pre-trial hearing in this case is re-scheduled to

_____, 2016, at _____ a.m./p.m.

Hon. Ronald B. Rubin
Judge, Circuit Court for Montgomery County