

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

* * * * *

Line Correcting Plaintiffs’ Opposition to Motion by Heller Brothers Realty, LLC for Summary Judgment, and for Other Relief

Plaintiffs, by and through the undersigned Plaintiff Class Counsel, respectfully submit this Line Correcting Plaintiffs’ Opposition to the Motion by Heller Brothers Realty, LLC (“HBR”) for Summary Judgment, and For Other Relief, (Plaintiffs’ “Opposition”). Dkt. no. 880.

Counsel for HBR has brought to the attention of Plaintiffs’ Class Counsel a factual misstatement contained in Plaintiffs’ Opposition. In particular, on page 2 of Plaintiffs’ Opposition, Plaintiffs state that a judgment was entered against HBR, intending to cite to the Final Judgment approving the 2018 settlement, Dkt. No. 369 (“2018 Settlement”), but inadvertently citing to the Master Judgment, Dkt. No. 429. The latter, of course, would indicate that an actual money judgment was entered against by HBR, when in fact it was not. Rather, following the 2018 Settlement between the Plaintiff and Defendant Settlement Classes, but before the entry of the Master Judgment, HBR requested, and Plaintiffs agreed to permit HBR to opt out of the 2018 Settlement, *nunc pro tunc*, and go back into the litigation class. Thus, no money judgment was ever entered by the Court against HBR.

RECEIVED

JAN - 6 2020

Clerk of the Circuit Court
Montgomery County, Md.

This inadvertent error does not affect the substance of Plaintiffs' Opposition, and was solely included in the Opposition for the purposes of background.

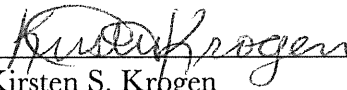
Dated: January 6, 2020

Respectfully submitted,

Richard S. Gordon
Kirsten S. Krogen
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*Attorneys for Representative Plaintiffs and
the Certified Plaintiff Class*

By:


Kirsten S. Krogen

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2020, copies of the foregoing Line Correcting Opposition to Motion by HBR Realty, LLC for Summary Judgment were served by first class on the following:

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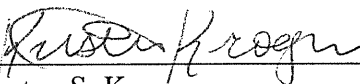
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