

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

* * * * *

AFFIDAVIT OF SERVICE

I, Catherine Stuckrath, state as follows:

1. I am a competent person over the age of eighteen and not a party to the case.
2. On August 28, 2015 I served Notices of Deposition together with Subpoena Duces Tecum and Attachment A by personal delivery to the following deponents:

Choon Ok Rhee
7461 Coca Cola Drive
Hanover, MD 21076
Resident Agent for:

- Germantown Plaza
T/A Lotte Assi Plaza

Tareica Scarlet, secretary to
Mark Olinger
3833 Farragut Ave.
Kensington, MD 20895
Resident Agent for:

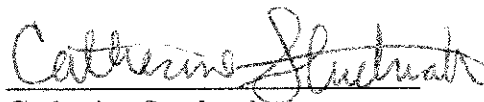
- Longmead Crossing Condominium
c/o Summit Management Services,
Inc.

Kiddy Asfaw, Receptionist for
Arnold J. Kohn, Esquire,
The Tower Companies
2000 Tower Oaks Blvd.
Rockville, MD 20852

- Blair Shopping Center
c/o Blair Towers, LLLP

3. A copy of the process for each deponent is attached hereto.
4. I do solemnly swear under the penalties of perjury that the statements made herein are true to the best of my knowledge, information and belief.

Date: 08-31-15



Catherine Stuckrath
102 W. Pennsylvania Ave. Suite 402
Towson, MD 21204
410-825-2300

CERTIFICATE OF SERVICE

I hereby certify, this 31st day of August 2015 that I served a copy of the foregoing

Affidavit of Service via first class mail, postage prepaid on:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850



Richard S. Gordon



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG
 Plaintiff
 TO: Germantown Plaza t/a Lotte Assi Plaza
 Name
7461 Coca Cola Drive
 Address
Hanover, MD 21076
 City, County, State, Zip

vs. G&C GULF d/b/a G&G TOWING
 Defendant
 Issue Date: 08/26/2015
 Service Deadline: 60 days after Issue Date.

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street On October 1, 2015 at 10:00 a.m. or p.m.
 Address of court or other location Date Time
Silver Spring, Maryland 20910
 City, State, Zip

- To testify in the above case, and/or
- To produce the following documents, items, and information, not privileged: Please see Attachment A.
- To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang requested issuance of this subpoena. Questions should be referred to:
 Requested By: Richard S. Gordon 102 W. Pennsylvania Ave. Suite 402
 Name Address
(410) 825-2300 Towson, Maryland 21204
 Phone City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

- If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.
- If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

 Signature

 Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

NOTICE OF DEPOSITION OF GERMANTOWN PLAZA
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Germantown Plaza t/a Lotte Assi Plaza
c/o Rhee Bros., Inc.
Serve on: Choon Ok Rhee
7461 Coca Cola Drive
Hanover, MD 21076

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

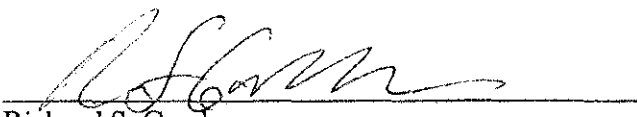
Attachment A.

Dated: August 28, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 28th day of August 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.

2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY

50 Maryland Avenue, Rockville, Maryland 20850
Phone: (240) 777-9400 Maryland Relay call: 711
Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Longmead Crossing Condominium

Issue Date: 08/26/2015

Service Deadline: 60 days after Issue Date.

Name
3833 Farragut Ave.

SUBPOENA

Address
Kensington, MD 20895

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

- If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.
- If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

**NOTICE OF DEPOSITION OF LONGMEAD CROSSING CONDOMINIUM
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Longmead Crossing Condominium
c/o Summit Management Services, Inc.
Serve on: Mark Olinger
3833 Farragut Ave.
Kensington, MD 20895

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

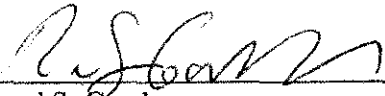
Attachment A.

Dated: August 28, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 28th day of August 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Blair Shopping Center, LLLP

Issue Date: 08/26/2015

Name
11501 Huff Court

Service Deadline: 60 days after Issue Date.

Address
N. Bethesda, MD 20895

SUBPOENA

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

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- If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

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3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

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 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

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

Plaintiff,

vs.

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

Defendant.

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

* * * * *

NOTICE OF DEPOSITION OF BLAIR SHOPPING CENTER, LLLP
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Blair Shopping Center, LLLP
c/o Blair Towers, LLLP
Serve on: Arnold J. Kohn, Esquire,
The Tower Companies
11501 Huff Court
N. Bethesda, MD 20895

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

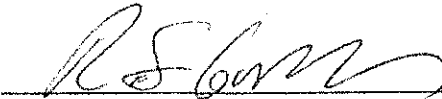
Attachment A.

Dated: August 28, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 28th day of August 2015 that I served a copy of the foregoing Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.