

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG

Plaintiff

vs.

G&C GULF, INC., D/B/A G&G TOWING

Defendant

CIVIL ACTION NO.: 403885V
TRACK VI – Judge Rubin

LINE

To the Clerk of the Court:

Please file the enclosed Declaration of Bryan Sherman that was inadvertently omitted as an attachment to Defendant's Motion for Protective Order to Quash Subpoenas.

THE LAW OFFICES OF RONALD S. CANTER, LLC



Ronald S. Canter, Esquire
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Telephone: (301) 424-7490
Facsimile: (301) 424-7470
rcanter@roncanterllc.com
Attorney for Defendant

RECEIVED

JUL 20 2015

Clerk of the Circuit Court
Montgomery County, Md.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by First Class Mail, postage prepaid on this 20th day of July, 2015 to:

Wildwood Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
7 St. Paul Street, Suite 820
Baltimore, MD 21202

Peterson Management, LC
SERVE: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, MD 21201

Montrose Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
7 St. Paul Street, Suite 820
Baltimore, MD 21202

Mid Pike Square Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
7 St. Paul Street, Suite 820
Baltimore, MD 21202

Gaithersburg Square Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
7 St. Paul Street, Suite 820
Baltimore, MD 21202

Strathmore at Bel Pre HOA, Inc.
c/o Chambers Management, Inc.
SERVE: Chambers Management, Inc.
12051 Tech Road, Suite B
Silver Spring, MD 20904

Richard S. Gordon, Esquire
Gordon, Wolf & Carney, Chtd.
102 West Pennsylvania Avenue, Suite 402
Towson, Maryland 21204
rgordon@gwcfirm.com
Attorney for Plaintiff

Leesborough HOA, Inc.
c/o Legum & Norman Realty, Inc.
SERVE: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, MD 21201

Kay Management Co., Inc.
SERVE: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, MD 21201

Grosvenor Park Maintenance Trust
SERVE: Abaris Realty, Inc.
12009 Nebel Street
Rockville, MD 20852

Greencastle Manor II
SERVE: Abaris Realty, Inc.
12009 Nebel Street
Rockville, MD 20852

Castlegate Townhouse Association, Inc.
SERVE: Abaris Realty, Inc.
12009 Nebel Street
Rockville, MD 20852

The Brownstones at Wheaton Metro HOA, Inc.
SERVE: Abaris Realty, Inc.
12009 Nebel Street
Rockville, MD 20852

Montrose Park HOA, Inc.
c/o Chambers Management, Inc.
SERVE: Chambers Management, Inc.
12051 Tech Road, Suite B
Silver Spring, MD 20904

Chambers Management, Inc.
SERVE: Chambers Management, Inc.
12051 Tech Road, Suite B
Silver Spring, MD 20904

The Bernstein Companies, Inc.
SERVE: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, MD 21201

Amberfield HOA, Inc.
SERVE: Abaris Realty, Inc.
12009 Nebel Street
Rockville, MD 20852

Fountain Hills Condominium Assoc.
c/o Vanguard Management Services, Inc.
SERVE: Bradley S. Glaser
1500 Serpentine Road, Suite 100
Baltimore, MD 21209

Scenery Point Condo
c/o Vanguard Management Services, Inc.
SERVE: Bradley S. Glaser
1500 Serpentine Road, Suite 100
Baltimore, MD 21209

Westmore Auto Park I
c/o Westmore Commercial Condo
Association, Inc.
SERVE: Jack Garson
7910 Woodmont Avenue, Suite 650
Bethesda, MD 20814

Gunners View HOA
c/o The Management Group Associates, Inc.
SERVE: Kathy Drury
20440 Century Blvd., Suite 100
Germantown, MD 20874

Abaris Realty, Inc.
SERVE: Lawrence I. Wachtel
1401 Rockville Pike, Suite 560
Rockville, MD 20814

Cassidy Turley
SERVE: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, MD 21201

HBW Group
SERVE: HBW Group
1055 First Street, Suite 200
Rockville, MD 20850

Audbon Square HOA
c/o Community Association, Inc.
SERVE: Joselyn Wells
15742 Crabbs Branch Way
Rockville, MD 20855

Montgomery Meadows
c/o Community Association, Inc.
SERVE: Joselyn Wells
15742 Crabbs Branch Way
Rockville, MD 20855

Meadows at Northlake HOA
c/o Community Association, Inc.
SERVE: Joselyn Wells
15742 Crabbs Branch Way
Rockville, MD 20855

Columbia Towers Condo
c/o Iko Real Estate, Inc.
SERVE: Louis Joseph Ianquinta
3416 Olandwood Court, Suite 210
Olney, MD 20832

Partners Properties, LLC
SERVE: Steven M. Richardson
1600 Holly Tree Road
Baltimore, MD 21220

Harvey Property Management Co., Inc.
SERVE: Richard M. Heger
6931 Arlington Road, Suite 500
Bethesda, MD 20814

Burnt Mills Crossing, LLC
SERVE: Leon W. Andris
8030 Woodmont Avenue, Suite 300
Bethesda, MD 20814

Hyde Park Condo Association
c/o Comsource Management, Inc.
SERVE: Peter P. Mechak
4620 Minuteman Drive
Rockville, MD 20853

Ventura Condos
c/o Phase One Management Services, LLC
SERVE: Laurie P. O'Toole
113 Aberdeen Road
Rockville, MD 20850

Leesborough HOA, Inc.
SERVE: Richard C. Stang
Deleon & Stang, CPAS
100 Lakeforest Blvd., Suite 650
Gaithersburg, MD 20877



Ronald S. Canter, Esquire
Attorney for Defendant

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG

Plaintiff

vs.

G&C GULF, INC., D/B/A G&G TOWING

Defendant

CIVIL ACTION NO.: 403885V

DECLARATION OF BRYAN SHERMAN

The undersigned hereby declares and affirms under the penalties of perjury and upon personal knowledge that the contents of this Affidavit are true:

1. I have personal knowledge of the matters set forth herein and I am competent to testify thereto.
2. I am employed by G&C Gulf, Inc., d/b/a G&G Towing ("G&G") and appeared for a deposition in this matter in connection with my duties for G&G .
3. G&G provides towing and roadside assistance services in the Washington, D.C, metropolitan area.
4. As part of its towing services, G&G sells its services by marketing to commercial properties.
5. Once a contract is finalized, G&G will display towing signs on the property and work with the company to obtain authorization to tow when a car is illegal parked on the premises owned or operated by its customers..

6. The towing business of which G&G operates is highly regulated by the Montgomery County government. Any violation of applicable regulations by G&G could subject G&G to significant penalties.

7. With respect to Plaintiff's tow in the above-referenced case, G&G received authorization from Walgreens to tow away Plaintiff's vehicle after he parked his car at Walgreens and left the premises.

8. Plaintiff had the immediate and continuous opportunity to retake his vehicle from G&G's storage site after it was towed.

9. To my knowledge, Plaintiff has had no contact with any of the 33 companies who were sent subpoenas in this lawsuit.

10. These subpoenas will be injurious to G&G's business. At minimum, they will cause the customers who are served to expend time and money answering the subpoenas all on account of their relationship with G&G. Perhaps more importantly, I believe that commercial companies are sensitive to towing issues in light of the applicable government regulations and fear of being associated in any way with allegations of illegal towing. The receipt by these companies of subpoenas for demands of contracts, agreements, and tow documents in a class action lawsuit solely because they are customers of G&G will, in my view, tarnish G&G's reputation with these companies and the industry as a whole, and it will damage future business prospects with them.

DATED: 7/16/2015



Bryan Sherman