

QUAN-EN YANG  
Plaintiff

VS.

G&C GULF D/B/A G&G TOWING  
Defendant

IN THE  
CIRCUIT COURT  
FOR  
MONTGOMERY COUNTY  
CASE NO: 403885-V


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**AFFIDAVIT OF SERVICE OF PRIVATE PROCESS SERVER**

I, Frank Bevacqua, do solemnly swear under the penalties of perjury that the statements made herein are true to the best of my knowledge, information and belief.

1. I am a competent person over the age of eighteen and not a party to the case.
2. I served a Subpoena, Attachment A ( Documents to be Produced under Subpoena), Notice of Deposition of Ventura Condos with Subpoena Duces Tecum, and Certificate of Service, by personal delivery to, Laurie P. O'Toole, Custodian of Records, Phase One Management Services, LLC, 113 Aberdeen Rd., Rockville, Md., 20850.

DATE: 07-08-15




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Frank Bevacqua  
P.O. Box 1196  
Hunt Valley, MD 21030  
(410) 963-7873  
Bond's Sure Serve

DATE	TIME	RACE	M-F	HT	WT	D.O.B
<u>07-08-15</u>	<u>6:05AM</u>	<u>WHITE</u>	<u>FEMALE</u>	<u>5-3</u>	<u>125</u>	<u>51</u>

**CERTIFICATE OF SERVICE**

I hereby certify, this 16<sup>th</sup> day of July 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

  
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

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

Plaintiff

Defendant

TO: Ventura Condos

Issue Date: 07/06/2015

Name  
611 Lofstrand Lane

Service Deadline: 60 days after Issue Date.

Address  
Rockville, MD 20850  
 City, County, State, Zip

**SUBPOENA**

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

Zipin, Amster & Greenberg, 836 Bonifant Street  
 Address of court or other location

On August 10, 2015 at 10:00  a.m. or  p.m.  
 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: 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 August 10, 2015.

- 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 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 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 VENTURA CONDOS**  
**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 Ventura Condos  
c/o Phase One Management Services, LLC  
Serve on: Laurie P. O'Toole  
113 Aberdeen Road  
Rockville, MD 20850

DATE: August 10, 2015

TIME: 10:00 a.m.

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

**Attachment A.**

Dated: July 9, 2015

Richard S. Gordon  
[rgordon@GWCfirm.com](mailto:rgordon@GWCfirm.com)  
Benjamin H. Carney  
[bcarney@GWCfirm.com](mailto: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 9<sup>th</sup> day of July 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

  
Richard S. Gordon

## ATTACHMENT A

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