

QUAN-EN YANG, et al.	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	
Plaintiffs,	*	FOR
vs.	*	MONTGOMERY COUNTY, MD.
G & C GULF, INC. d/b/a	*	Case No. 403885-V
G&G TOWING. , et al.	*	Hon. Ronald B. Rubin
Defendants.	*	Specially Assigned
	*	TRACK VI

* * * * *

**CONSENT MOTION TO EXTEND DATE FOR MAILING NOTICE
TO THE CLASS UNDER PARAGRAPH 7 OF THE COURT’S ORDER
PRELIMINARILY APPROVING AGREEMENT AND SETTING SCHEDULE**

Plaintiffs, Quan-en Yang and the Class, by and through the undersigned Class Counsel, and with the consent of the Defendants, hereby move the Court to extend the deadline for mailing notice to the Class under ¶7 of the Court’s Order Preliminarily Approving Agreement and Setting Schedule (Dkt. No. 120, entered January 12, 2016) (hereinafter the “Order”). As grounds, Plaintiffs state as follows:

1. On January 12, 2016 the Court entered an Order in this class action preliminarily approving an Agreement for the resolution of the action between Plaintiffs and Defendant G&C Gulf, Inc, d/b/a G&G Towing (“G&G Towing”).
2. The Order, *inter alia*, set the schedule for sending notice to the class. In particular, under Paragraph 7 of the Order, the Escrow Administrator – Strategic Claims Services (“SCS”) – must mail the notice to the Class within 45 days of the entry of the Order. Accordingly, under the Order, the deadline for mailing notice to the class is February 26, 2016.
3. In preparation for mailing the Notice, the SCS has been using Defendant G&G Towing’s records and database to identify and locate the 25,811 persons who fall within the

definition of the Class certified by the Court. As of the filing of this Consent Motion, SCS has already located 15,679 of the 25,811 Class members.

4. SCS is in the process of locating the remaining 10,132 Class Members using the Accurint database, a search tool developed by Lexis/Nexis. Class Counsel, based upon our discussions with SCS, has confidence that a high percentage of the remaining Class Members (70-90% of the remaining 10,132) will be located using Accurint.

5. To complete this process, SCS advises that it needs an additional ten (10) days to mail the notice to the Class. Given the likelihood that the additional time will result in SCS finding a higher percentage of the Class Members, Class Counsel agree that an extension of ten (10) days to mail the notice to the Class is both appropriate and necessary. If the Court grants the extension of ten (10) days, the deadline for mailing the notice to the Class will be extended to March 7, 2016.

6. Counsel for Defendants in this case have reviewed this Motion and consent to the additional ten (10) days to mail the notice to the Class.

7. No other dates or deadlines set forth in the Order are effected by this extension, including the date for the Final Approval Hearing which is currently scheduled for May 3, 2016.

WHEREFORE, Plaintiffs request that the Court extend by ten (10) days the date for mailing notice to the Class under Paragraph 7 of the Court's Order, making the deadline from mailing the notice March 7, 2016.

Respectfully submitted,

Dated: February 22, 2016

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Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 22nd day of February 2016 that I served a copy of the foregoing Consent Motion to Extend Date for Mailing Notice to the Class Under Paragraph 7 of the Court's Order Preliminarily Approving Agreement and Setting Schedule and proposed Order by first class mail, postage prepaid and electronic mail on the following:

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Richard S. Gordon

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* * * * *

ORDER

UPON CONSIDERATION OF the Consent Motion to Extend Date for Mailing Notice to the Class Under Paragraph 7 of the Court’s Order Preliminarily Approving Agreement and Setting Schedule (“Consent Motion”), and for good cause shown, it is this ___ day of February, 2016,

ORDERED that the Consent Motion is hereby GRANTED, and

IT IS FURTHER ORDERED that the deadline for the Escrow Administrator to mail notice to the Class under Paragraph 7 of the Court’s Order Preliminarily Approving Agreement and Setting Schedule, is hereby extended by ten (10) days to March 7, 2016.

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