

CT

351 West Camden Street
6th Floor
Baltimore, MD 21201
410.539.2837 tel
410.332.1178 fax
www.ctcorporation.com

July 02, 2015

Richard S. Gordon
Gordon, Wolf & Carney, CHTD.
102 West Pennsylvania Ave.,
St. 402,
Baltimore, MD 21204

Re: Quan-En Yang, Pltf. vs. G&C Gulf, etc., Dft. // To: Leesborough HOA, Inc.

Case No. 403885V

Dear Sir/Madam:

After checking our records and the records of the State of MD, it has been determined that C T Corporation System is not the registered agent for an entity by the name of Leesborough HOA, Inc..

CT was unable to forward.

Very truly yours,

C T Corporation System

Log# 527399562

Sent By Regular Mail

cc: Montgomery County - Circuit Court
50 Maryland Avenue,
Rockville, MD 20850

(Returned To)

Richard S. Gordon
Gordon, Wolf & Carney, CHTD.
102 West Pennsylvania Ave.,
St. 402,
Baltimore, MD 21204



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: Leesborough HOA, Inc., C/O Legum & Norman
 Name
5401 N. Central Expy., Suite 300
 Address
Dallas, TX 75205
 City, County, State, Zip

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

Issue Date: 07/01/2015
 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
 Address of court or other location

On August 3, 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 3, 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 LEESBOROUGH HOA, INC.
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 Leesborough HOA, Inc.,
C/O Legum & Norman Realty, Inc.
Serve on: The Corporation Trust Incorporated
351 West Camden Street
Baltimore, Maryland 21201

DATE: August 3, 2015

TIME: 10:00 a.m.

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

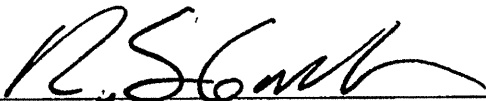
Attachment A.

Dated: July 2, 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 2nd 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

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.