

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

**DEFENDANT'S MOTION TO SHORTEN TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS MOTION FOR PROTECTIVE ORDER AND TO QUASH SUBPOENAS
PURSUANT TO MARYLAND RULE 2-403**

Your Defendant, G&C Gulf, Inc., d/b/a G&G Towing (hereinafter "G&G"), by and through counsel, moves, pursuant to Maryland Rule 1-204(a)(1), for an Order shortening the time for Plaintiff to respond to its Motion to Quash Subpoenas, and in support thereof states as follows:

1. On July 10, 2015, Defendant filed its Motion for Protective Order to Quash 33 third party Subpoenas issued by Plaintiff on July 2, 2015 and July 9, 2015.
2. The 33 Subpoenas sought information from Defendant's customers that is more conveniently obtainable through Defendant.
3. The Subpoenas require the production of documents to be made on August 3, 2015 or August 10, 2015.
4. In order to allow this Court sufficient time to rule on Defendant's Motion, and in order to allow the parties that were issued the subpoenas to comply should Defendant's Motion be denied, Defendant has asked and Plaintiff has agreed that Plaintiff's response be due on or before July 24, 2015.

5. Defendant submits that good cause for the entry of an order shortening time exists given the extent of these invasive discovery requests that duplicate requests for information served on the Defendant.,

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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 17th day of July, 2015 to:

Wildwood Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
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Leesborough HOA, Inc.
c/o Legum & Norman Realty, Inc.
SERVE: The Corporation Trust Incorporated
351 West Camden Street
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Montrose Shopping Center
c/o Federal Realty Investment Trust
SERVE: CSC-Lawyers Inc. Service Co.
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Kay Management Co., Inc.
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Mid Pike Square Shopping Center
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Gaithersburg Square Shopping Center
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Strathmore at Bel Pre HOA, Inc.
c/o Chambers Management, Inc.
SERVE: Chambers Management, Inc.
12051 Tech Road, Suite B
Silver Spring, MD 20904

Montrose Park HOA, Inc.
c/o Chambers Management, Inc.
SERVE: Chambers Management, Inc.
12051 Tech Road, Suite B
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Chambers Management, Inc.
SERVE: Chambers Management, Inc.
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The Bernstein Companies, Inc.
SERVE: The Corporation Trust Incorporated
351 West Camden Street
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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

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.
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Abaris Realty, Inc.
SERVE: Lawrence I. Wachtel
1401 Rockville Pike, Suite 560
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Cassidy Turley
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HBW Group
SERVE: HBW Group
1055 First Street, Suite 200
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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
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Scenery Point Condo
c/o Vanguard Management Services, Inc.
SERVE: Bradley S. Glaser
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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

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
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Hyde Park Condo Association
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SERVE: Peter P. Mechak
4620 Minuteman Drive
Rockville, MD 20853

Meadows at Northlake HOA
c/o Community Association, Inc.
SERVE: Joselyn Wells
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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

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
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ORDER

Upon consideration of Defendant's Motion to Quash Subpoenas, and any opposition, it is
this ____ day of _____, 2015;

ORDERED, that the Motion be, and hereby is **GRANTED**,

ORDERED, that Plaintiff's 33 Subpoenas issued be **QUASHED**.

JUDGE