

QUAN-EN YANG, *et al.*
On Their Own Behalf and on Behalf
of All Others Similarly Situated,

Plaintiffs,

vs.

G & C GULF, INC. d/b/a
G&G TOWING, *et al.*

and

BRUCE PATNER t/a
PATNER PROPERTIES,
On His Own Behalf and on Behalf
of All Others Similarly Situated

Defendants.

* IN THE
* CIRCUIT COURT
* FOR
* MONTGOMERY COUNTY, MD.
* Case No. 403885V
* TRACK VI
*
* Hon. Ronald B. Rubin,
* Specially Assigned
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**CONSENT MOTION TO EXTEND TIME TO MAIL
NOTICE TO THE MEMBERS OF THE DEFENDANT CLASS
UNDER ADMINISTRATIVE ORDER NO. 2**

Named Plaintiffs Quan-en Yang, Mary Lois Pelz and Darcy Pelz-Butler on behalf of the certified Plaintiff Class in this case, with the consent of Defendants, move the Court to extend the deadline set forth in Administrative Order No. 2 for mailing notice to the members of the certified Defendant Class by an additional Three (3) weeks, and state as follows:

1. On March 13, 2017, this Court entered Administrative Order No. 2 which includes the protocol and procedure for mailing the Court approved Notice to the certified Defendant Class in this case. Dkt. No. 240.

2. Paragraph 6(A) of Administrative Order no. 2 requires that the Notice “shall be sent under the direction of Plaintiffs’ Class Counsel to all Defendant Class members within Thirty (30) days of the entry of this Administrative Order No. 2.”

3. Because Counsel for the Plaintiff and Defendant Classes had resumed settlement negotiations with the assistance of The Honorable James Eyer, and believed that a short extension on the mailing of the Notice to the Defendant Class would facilitate those discussions, the Parties have already requested, and the Court has granted, a number of extensions of the mailing period. *See* Dkt. Nos. 247, 250, 252 and 256. Under the Court's most recent Order, entered on July 3, 2017 (Dkt. no. 256), the current deadline for mailing the Notice is July 31, 2017.

4. Although Plaintiffs had not anticipated requesting any further extensions of time on the mailing of the Defendant Class Notice absent an executed Term Sheet, Judge Eyer specifically requested that the Parties file this Motion. Because the Parties are continuing to make progress in crafting a settlement – we have exchanged several new drafts of the proposed settlement Term Sheet over the past Three weeks – Judge Eyer has asked that we advise the Court that he believes an additional extension will facilitate the discussions and enable the Parties to work through the final terms and conditions of settlement.

5. Accordingly, an extension of Three (3) weeks to mail the Notice is requested. If granted, the new deadline for mailing the Notice will be **August 21, 2017**. Should the Parties agree upon and execute a Term Sheet, counsel for the Plaintiff Class and the Defendant Class will so advise the Court and request a status conference to address the scheduling of further proceedings in this case.

6. Plaintiffs have provided a copy of this Motion to counsel for the Defendant Class who join in the request and consent to the Motion.

WHEREFORE, Plaintiffs respectfully request that the Court extend the deadline for mailing notice to the members of the certified Defendant Class by Three (3) week to **August 21, 2017.**


Respectfully submitted,

Dated: July 31, 2017

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Attorneys for Named Plaintiffs and
the Certified Plaintiff Class

By:


Richard S. Gordon

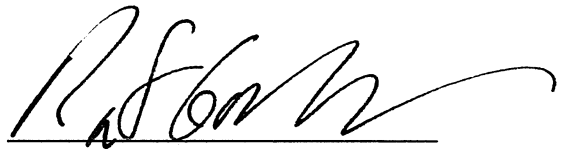
CERTIFICATE OF SERVICE

I hereby certify that on this 31th day of July, 2017, I served the foregoing Consent Motion to Extend Time to Mail Notice to the Members of the Defendant Class Under Administrative Order No. 2, and proposed Order, by electronic mail and first-class mail, postage prepaid on:

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Richard S. Gordon

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ORDER

UPON CONSIDERATION OF the Consent Motion to Extend Time to Mail Notice to the Members of the Defendant Class Under Administrative Order No. 2, and for good cause shown, it is this ____ day of _____, 2017,

ORDERED that the Consent Motion is hereby GRANTED,

IT IS FURTHER ORDERED that the deadline for mailing the Notice to the certified Defendant Class is extended by an additional Three (3) weeks, making the revised deadline for mailing the Notice **August 21, 2017**.

Honorable Ronald B. Rubin