

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

QUAN-EN YANG, *et al.* :
Plaintiffs, :
v. : Case No. 403885-V
G&C GULF, INC., *et al.* :
Defendant. :

**DECOVERLY IV CONDOMINIUM, INC.
RESPONSE TO PLAINTIFFS' SUBPOENA**


Decoverly IV Condominium, Inc. ("Association"), by and through its undersigned counsel, submits the following in response to Plaintiffs' subpoena:

Subpoena Request 1: 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.

Response to No. 1: The Association does not have any documents responsive to the subpoena.

Respectfully submitted,

LERCH EARLY & BREWER, CHTD.



Ruth O. Katz
3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
(301) 986-1300

Counsel for Decoverly IV Condominium, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of September, 2015, a copy of the foregoing Discoverly IV Condominium, Inc. Response to Plaintiffs' Subpoena was served via first-class mail, postage prepaid, to:

Richard S. Gordon, Esq.
102 West Pennsylvania Avenue
Suite 402
Baltimore, Maryland 21204
Counsel for Plaintiffs

Ronald S. Canter, Esq.
Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Counsel for Defendant G & G Gulf, Inc.

Frederic J. Einhorn, Esq.
27 West Jefferson Street, Suite 204
Rockville, Maryland 20850
Counsel for Defendant Glenn W. Cade, Jr.



Ruth O. Katz

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CERTIFICATE REGARDING DISCOVERY

I HEREBY CERTIFY that on this 17th day of September, 2015, I served on all counsel hereto, by First-Class Mail, postage prepaid, a copy of Decoverly IV Condominium, Inc.'s Response to Plaintiff's Subpoena and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.

Respectfully submitted,

LERCH EARLY & BREWER, CHTD.



Ruth O. Katz
3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
(301) 986-1300
Counsel for Decoverly IV Condominium, Inc

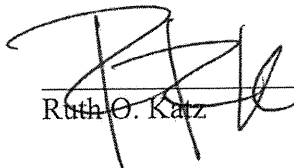
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of September, 2015, a copy of the foregoing Certificate Regarding Discovery was served via first-class mail, postage prepaid, to:

Richard S. Gordon, Esq.
102 West Pennsylvania Avenue
Suite 402
Baltimore, Maryland 21204
Counsel for Plaintiffs

Ronald S. Canter, Esq.
Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Counsel for Defendant G & G Gulf, Inc.

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