

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

Plaintiffs,

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

RECEIVED  
MAR 16 2020

\* \* \* \* \*

Clerk of the Circuit Court  
Montgomery County, Md.

**CONSENT MOTION TO PAY THE ESCROW ADMINISTRATOR'S  
INVOICE FROM THE COMMON FUND**

Plaintiffs, with the consent of defense counsel, except counsel for Westmore Commercial Condominium Association who takes no position, file this Consent Motion to Pay the Escrow Administrator's Invoice from the Common Fund.

Strategic Claims Services ("SCS") the escrow administrator appointed by the Court in Paragraph 5 of the Order Preliminarily Approving the 2019 Proposed Compromise of Plaintiffs' Claims (Dkt. No. 828), has provided an invoice, attached hereto as Exhibit A, for the fees and costs incurred in connection with the Plaintiffs' Motion for Preliminary Approval of the 2019 Proposed Compromise of Claims on May 10, 2019 (Dkt. No. 826). The invoice is for costs associated with distribution of a second settlement check to Plaintiff Settlement Class members.

Pursuant to Paragraph 9 of the Order Preliminarily Approving the 2019 Proposed Compromise of Plaintiffs' Claims (Dkt. No. 828), Class Counsel respectfully request that this

invoice, in the amount of \$47,239.44,<sup>1</sup> be paid from the Common Fund as defined in paragraph 19(i) of the Settlement Agreement.

WHEREFORE, Representative Plaintiffs respectfully request that the Court Order that SCS be paid \$47,239.44 from the Common Fund and grant further relief as the nature of this case may require.

Dated: March 13, 2020

GORDON, WOLF & CARNEY, CHTD.

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Facsimile: (410) 825-0066

Attorneys for Plaintiffs and the Class

By:

  
Richard S. Gordon

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<sup>1</sup> As shown on the invoice attached as Exhibit A, a large bulk of the charges incurred by SCS relate to the mailing of checks to the class resulting from the 2019 compromise of Plaintiffs' claims.

**CERTIFICATE OF SERVICE**

I hereby certify on this 13<sup>th</sup> day of March, 2020, that I served a copy of the Consent Motion to Pay the Escrow Administrator's Invoice from the Common Fund by first-class mail, postage prepaid, on the following:

Gardner M. Duvall  
Patrick D. McKevitt  
Whiteford, Taylor & Preston, LLP  
Seven Saint Paul Street, Suite 1500  
Baltimore, Maryland 21202

Thomas D. Murphy  
Murphy & Mood, P.C.  
31 Wood Lane, Suite 2  
Rockville, Maryland 20850

Michael Campbell  
Miller, Miller & Canby  
200-B Monroe Street  
Rockville, Maryland 20850

Longmead Crossing Condominium and  
Summit Management Services, Inc.  
c/o Summit Management Services Inc.  
3833 Farragut Ave.  
Kensington, Maryland 20895

Serve on:  
Mr. Mark Olinger, Resident Agent  
3833 Farragut Ave.  
Kensington, Maryland 20895

John R. Garza d/b/a  
Olde Town Parking  
17 West Jefferson St.  
Rockville, Maryland 20850

Serve on:  
Mr. John Garza  
17 West Jefferson St.  
Rockville, Maryland 20850

Redmill Shopping Center Associates  
Limited Partnership

5307 N. Charles St.  
Baltimore, Maryland 21210

Serve on:

Ms. Lynn Kapiloff, Resident Agent  
5307 N. Charles St.  
Baltimore, Maryland 21210

Kapiloff Services, LLC  
5307 N. Charles Street  
Baltimore, Maryland 21210

Serve on:

Theodore W. Hirsh  
100 North Charles St., Suite 620  
Baltimore, Maryland 21201

John Spanos d/b/a New Hampshire Center  
6822 New Hampshire Ave  
Takoma Park, Maryland 20912

Serve on:

Charles Thomas Brown, Esq.  
Silver & Brown, P.C.  
10621 Jones Street, Suite 101  
Fairfax, VA 22030

Harvey Property Management Company, Inc.  
6708 Wisconsin Avenue, Suite 360  
Bethesda, Maryland 20815

Serve on:

Mr. Richard M. Heger, Resident Agent  
6708 Wisconsin Avenue, Suite 360  
Bethesda, Maryland 20815

  
Richard S. Gordon

# **EXHIBIT A**

**STRATEGIC CLAIMS SERVICES  
225 STATE ROAD  
MEDIA, PA 19063  
610-891-9852**

January 24, 2020

Richard S. Gordon, Esquire  
Gordon, Wolf & Carney CHTD  
102 W. Pennsylvania Avenue  
Suite 402  
Towson, MD 22104

RE: G & G Towing 2019 Settlement – Strategic Claims Services (“SCS”) Invoice –  
Inception through 1/23/20

**INVOICE**

Labor charges inception through 1/23/20 (See Exhibit I).....	\$29,991.88
Printing, mailing, labeling postage for 10,500 postcard mailings.....	\$4,935.00
Distribution charge for 7,782.00 checks.....	\$11,673.00
Re-mailings of notices.....	\$215.25
Phone, overnight charges, bank charges, scanning, printing and skip tracing .....	<u>\$424.31</u>
Total	<u>\$47,239.44</u>

# EXHIBIT I

	<u>Labor</u> <u>Hours</u>	<u>Rate</u>	<u>Fee</u>
Project Administrators	11.38	\$75.00	\$853.50
Project Supervisor	2.10	\$115.00	\$241.50
Project Manager	156.00	\$125.00	\$19,500.00
Director of Quality Assur	50.50	\$167.50	\$8,458.75
Director of Operations	0.50	\$180.00	\$90.00
President	<u>2.88</u>	\$295.00	<u>\$848.13</u>
	<u>223.36</u>		<u>\$29,991.88</u>

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\* \* \* \* \*

**ORDER GRANTING CONSENT MOTION TO PAY THE ESCROW  
ADMINISTRATOR'S INVOICE FROM THE COMMON FUND**

Upon consideration of the Consent Motion to Pay the Escrow Administrator's Invoice from the Common Fund ("Consent Motion"), it is this \_\_\_\_ day of March, 2020, by the Circuit Court for Montgomery County, hereby,

ORDERED, that the Consent Motion is GRANTED; and further,

ORDERED, that the January 24, 2020 invoice of Strategic Claims Services, in the amount of **\$47,239.44** shall be paid from the Common Fund as defined in Paragraph 19(i) of the Settlement Agreement.

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