

QUAN-EN YANG, *et al.*  
On Their Own Behalf and on Behalf  
Of 3 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.

\* \* \* \* \*

**LINE**

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.  
\* Case No. 403885V  
\* TRACK VI  
\*  
\* Hon. Ronald B. Rubin,  
\* Specially Assigned  
\*

Attached for filing is the Declaration of Josephine Bravata Concerning the Mailing of the  
Postcard Notice Pursuant to Administrative Order No. 1 (Dkt. No. 148).

Respectfully submitted,

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(410) 825-2300  
(410) 825-0066 (facsimile)

*Attorneys for Plaintiff Class*

**RECEIVED**

APR 13 2018

Clerk of the Circuit Court  
Montgomery County, Md.

By:   
Richard S. Gordon

**CERTIFICATE OF SERVICE**

I hereby certify, this 13th day of April 2018, that I served a copy of the foregoing Line, by hand delivery on:

James Ulwick  
Jean E. Lewis  
Kramon & Graham, PA  
One South Street  
Suite 2600  
Baltimore, Maryland 21202

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

And by first-class mail, postage pre-paid on:

Matthew Patner  
Patner Law  
110 N. Washington Street  
Suite 340  
Rockville, Maryland 20850

  
Richard S. Gordon

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., et al.

Defendants.

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* MONTGOMERY COUNTY, MD.  
\* Case No. 403885-V  
\* Hon. Ronald B. Rubin  
\* Specially Assigned  
\* TRACK VI

\* \* \* \* \*

**DECLARATION OF JOSEPHINE BRAVATA  
CONCERNING THE MAILING OF THE POSTCARD NOTICE  
PURSUANT TO ADMINISTRATIVE ORDER NO. 1 (Dkt. No. 148)**

I, Josephine Bravata, declare as follows:

1. I submit this declaration in order to provide the Court and the parties to the above-captioned litigation with information regarding the mailing of the Postcard Notice that was sent to the members of the then-putative Defendant Class pursuant to Administrative Order No. 1 (Dkt. No. 148). I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein. See an Exemplar of the Postcard Notice attached as **Exhibit A**.

2. At the outset, I note that this Declaration is long overdue. As set forth in ¶6 of Administrative Order No. 1, SCS was required to provide this Declaration on or about June 16, 2016 (10 days following the mailing). SCS takes full responsibility for the oversight and files the Declaration at this time so that Court record is complete and to assure that there is no confusion concerning whether the mailing of Postcard Notice to the then-putative Defendant Class Members complied with the requirements of Administrative Order No. 1. It did.

3. I am the Quality Assurance Manager of Strategic Claims Services ("SCS"), a nationally recognized claims administration firm. I have over sixteen years of experience specializing

in administration of class action cases. SCS was established in April 1999 and has administered over three-hundred fifty (350) class action cases since its inception.

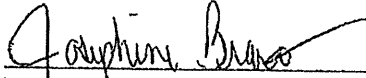
4. SCS was appointed as the Escrow Administrator in the above-captioned litigation. In addition to our services identifying and locating the members of the Plaintiff Class in this case, SCS also prepared and mailed the Postcard Notice to the members of the then-putative Defendant Class under ¶15 of Administrative Order No. 1 (Dkt. No. 148). In order to satisfy the requirements set by the Court, SCS typeset the Postcard and then mailed it to a list of 572 then-putative Defendant Class Members compiled by the Plaintiff Class Counsel.

5. We mailed, by first class mail, the Postcard Notices approved by the Court to 572 then-putative Defendant Class Members. The Postcard Notices were mailed on June 6, 2016. Initially, there were 56 returned postcards. We obtained new addresses for four (4) of the Defendants and then mailed them a second Postcard. In the end, fifty-two (52) Postcards were returned undeliverable.

6. Contemporaneous with the mailing of the Postcard Notice, SCS maintained an Excel spreadsheet and Access database to capture and memorialize all of the information relating to the mailing. Accordingly, information concerning the mailing, including whether the Postcard Notice was returned as undeliverable, is maintained by SCS and available for production should the Court have any questions concerning the mailing.

I solemnly declare under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information, and belief.

Executed this 11<sup>th</sup> day of April 2018, in Media, Pennsylvania.

  
Josephine Bravata

G&G Towing Class Action  
c/o Strategic Claims Services  
P.O. Box 230  
Media, PA 19063

**THIS IS NOT JUNK MAIL.**

**THIS POSTCARD  
PROVIDES IMPORTANT  
INFORMATION ABOUT  
YOUR LEGAL RIGHTS AS A  
POTENTIAL MEMBER OF  
A DEFENDANT CLASS  
ACTION.**

**EXHIBIT A**

## **The Circuit Court for Montgomery County, Maryland authorized this notice**

*This is not a solicitation from a lawyer*

**Why am I receiving this notice?** You are receiving this notice as a result of a class action complaint in Yang v. G&C Gulf, Inc., t/a G&G Towing, et al., Case No. 403885V, filed in the Circuit Court for Montgomery County, Maryland, commenced by Plaintiff Quan-en Yang (the ‘Plaintiff Class Representative’) on his own behalf and on behalf of all others similarly situated against: (1) G&C Gulf, Inc., t/a G&G Towing, and (2) a Defendant Class represented by Bruce Patner t/a Patner Properties as the Defendant Class Representative (on his own behalf and on behalf of all others similarly situated). On May 3, 2016, the Court ordered that this notice be sent to all members of the putative Defendant Class. You have been identified as a member of the putative Defendant Class. YOUR LEGAL RIGHTS MAY BE AFFECTED BY THIS LAWSUIT.

**What Is The Lawsuit About?** The Plaintiff Class Representative claims that Defendant G&G Towing – acting under the authority of contracts with parking lot owners, managers and/or agents throughout Montgomery County (i.e., the Defendant Class) – engaged in predatory towing of vehicles that violated duties set forth in Maryland’s Towing or Removal of Vehicles from Parking Lots Law, (Md. Code Ann., Transp. §21-10A-01 et seq.), Montgomery County’s Tow Ordinances (Montgomery County Code, § 30C-1, et seq.) and the common law of Maryland. The Plaintiff Class claims that the members of the Defendant Class are derivatively liable, including jointly and severally liable, for G&G Towing’s violations of the law. On May 3, 2016, the Circuit Court for Montgomery County entered Judgment for \$22 million on all Counts in the Second Amended Complaint in favor of the certified Plaintiff Class against Defendant G&G Towing. The Named Defendant Class Representative is Bruce Patner t/a Patner Properties, 4720 Montgomery Lane, Bethesda, Maryland 20814.

**Why Was This Notice Sent To You?** Defendant G&G Towing’s records show that you are a member of the putative Defendant Class because you entered into a written contract with G&G Towing for the provision of trespass towing services which resulted in one or more vehicles being towed from your parking lot(s) between April 16, 2012 and January 7, 2016.

**Who Represents the Plaintiff Class in this Lawsuit?** The Plaintiff Class in this case is represented by Richard S. Gordon and Benjamin H. Carney of Gordon, Wolf & Carney, Chtd., 102 West Pennsylvania Avenue, Suite 402, Towson, Maryland 21204.

**Where can I get more information?** The website [www.TowingClassAction.com](http://www.TowingClassAction.com) includes additional information about this lawsuit including documents from the Court docket.