

1 HARMEET K. DHILLON (SBN: 207873)

2 harmeet@dhillonlaw.com

3 KRISTA L. BAUGHMAN (SBN: 264600)

4 kbaughman@dhillonlaw.com

5 GREGORY R. MICHAEL (SBN: 306814)

6 gmichael@dhillonlaw.com

7 DHILLON LAW GROUP INC.

8 177 Post Street, Suite 700

9 San Francisco, California 94108

10 Telephone: (415) 433-1700

11 Facsimile: (415) 520-6593

12 Attorneys for Plaintiffs and Settlement Class

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 **QIUZI HU**, an individual, **EDWIN RAMIREZ**,  
17 an individual, **IVAN RONCERIA**, an individual,  
18 **WENZHI FEI**, an individual, on behalf of  
19 themselves and all others similarly situated,

20 Plaintiffs,

21 v.

22 **JOSE M. PLEHN-DUJOWICH, a.k.a. JOSE**  
23 **M. PLEHN**, an individual; **BIZQUALIFY LLC**,  
24 a California limited liability company; and  
25 **POWERLYTICS, INC.**, a Delaware corporation,

26 Defendants.

Case Number: 3:18-cv-01791-JCS

Honorable Joseph C. Spero

**DECLARATION OF QIUZI HU IN**  
**SUPPORT OF MOTION FOR**  
**ATTORNEYS' FEES, COSTS, AND**  
**INCENTIVE AWARDS**

Date: February 14, 2020

Time: 2:00 p.m.

Courtroom: G

1 I, Qiuzi Hu, declare as follows:

2 1. I am a Plaintiff and Class Representative in the above-captioned case, which asserts  
3 collective and class claims against Defendants Jose Plehn-Dujowich (“Dr. Plehn-Dujowich”) and  
4 Bizqualify LLC (“BizQualify”) in connection with the Global Financial Data Project (“GFDP”) and  
5 related activities. I have personal knowledge of the matters set forth herein, and if called as a witness  
6 could and would competently testify thereto.

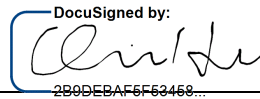
7 2. Both before and during the course of this lawsuit I have worked diligently to assert  
8 claims and secure favorable settlement for the Class and myself. These efforts have included the  
9 following:

- 10 a. approximately 21 hours spent researching and contacting law firms;  
11 b. approximately 9 hours spent meeting with and interviewing lawyers prior to retaining  
12 the Dhillon Law Group, Inc. (“Class Counsel”);  
13 c. approximately 32 hours corresponding or otherwise communicating with Class  
14 Counsel, the other Class Representatives, and members of the Settlement Class about  
15 this case;  
16 d. approximately 36 hours collecting and organizing evidence (e.g. flyers, certificates,  
17 recommendation letters, web archive screenshots, email threads, etc.) pertaining to the  
18 GFDP;  
19 e. approximately 10 hours reviewing and approving court filings and providing testimony  
20 in support thereof.

21 3. I respectfully request that the Court issue an order awarding me an incentive payment  
22 in the amount of \$6,000, pursuant to the terms of the Class Settlement Agreement. I believe this  
23 amount to be reasonable, fair, and appropriate based on my contributions to this case.

24 I declare under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct.

26  
27 Date: November 18, 2019

DocuSigned by:  
  
2B9DEBAF5F63458...

28 Qiuzi Hu