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Attorneys for Plaintiffs and Settlement Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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

Plaintiffs,

v.

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

Defendants.

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

Honorable Joseph C. Spero

**DECLARATION OF GREGORY R.
MICHAEL IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND
INCENTIVE AWARDS**

Date: February 14, 2020

Time: 2:00 p.m.

Courtroom: G

1 I, Gregory R. Michael, declare as follows:

2 1. I am an attorney in good standing duly admitted to practice before all Courts of the
3 State of California since 2015. I am an associate of the Dhillon Law Group Inc., counsel of record for
4 Plaintiffs Qiuzi Hu, Edwin Ramirez, Ivan Ronceria, and Wenzhi Fei (“Class Representatives”) and
5 Class Counsel. 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. I graduated *cum laude* from UC Hastings College of the Law in May 2015. Since
8 December 2015, I have practiced civil litigation full time as an associate of Dhillon Law Group Inc.

9 3. During the course of this litigation, I have been primarily responsible for the day-to-
10 day litigation activities, including communicating with the Class Representatives and Defendants’
11 counsel; the drafting of pleadings, motions, declarations, and other court filings; the drafting of the
12 Class Settlement Agreement; and the procurement and culling of the large amount of evidence related
13 to this action. I performed this work under the supervision of Harmeet K. Dhillon, and at times in
14 collaboration with other partners, associates, and staff of my firm.

15 4. Class Representatives and the putative Settlement Class have incurred reasonable
16 attorneys’ fees in connection with this litigation and in reaching the proposed Class Settlement.
17 According to my firm’s billing records, I logged in excess of 853 hours in carrying out the activities
18 related to our representation of Class Representatives and the Settlement Class. During the relevant
19 period (Fall 2017 through present), my reasonable hourly billing rate for this and other matters has
20 increased from \$325 to \$400 per hour, and is currently \$450 per hour.

21 5. I believe the time I, and the other counsel and staff, spent on matters related to this
22 litigation on behalf of Class Representatives to have been reasonably necessary and proper under the
23 circumstances of this case. From the outset of our representation of Class Representatives, we made
24 substantial efforts to seek an early, negotiated resolution of Class Representatives’ claims, including
25 by attempting to voluntarily exchange documents and information with Defendants and engaging in
26 early mediation. Unfortunately, our efforts to reach an early settlement were unsuccessful, and
27 Defendants later defaulted, only to reappear after Class Representatives successfully obtained
28 certification of the Class.


1 6. I reasonably expect that I, and likely other attorneys on this case, will expend several
2 additional hours of time drafting Class Representatives' motion for final approval of this settlement
3 and attending a hearing for the same.

4 7. My firm has also agreed to act as the Settlement Administrator in order to effectuate
5 the Settlement in an efficient, cost effective manner, without requiring usage of settlement funds to
6 hire an outside specialist. I reasonably expect that I, and other members of our staff, will need to
7 devote a significant amount of time over the next five years in order to perform these administrative
8 duties. Pursuant to the terms of the Settlement Agreement, any Fee and Expense Award issued by the
9 Court may properly consider reasonable amounts likely to be incurred in our capacity as Settlement
10 Administrator.

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

13
14 Date: November 18, 2019

By:


Gregory R. Michael