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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 EDWIN RAMIREZ IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND
INCENTIVE AWARDS**

Date: February 14, 2020

Time: 2:00 p.m.

Courtroom: G

1 I, Edwin Ramirez, 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 and Bizqualify, LLC in
4 connection with the Global Financial Data Project (“GFDP”) and related activities. I have personal
5 knowledge of the matters set forth herein, and if called as a witness could and would competently
6 testify thereto.

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

9 a. approximately 3 to 5 hours conferring with the other Class Representatives regarding
10 finding and retaining legal counsel;

11 b. approximately 15 hours corresponding or otherwise communicating with Class
12 Counsel, the other Class Representatives, and members of the Settlement Class about
13 this case;

14 c. approximately 24 hours collecting and organizing evidence (e.g invoices, email
15 threads, WeChat messages, and compiling residential addresses of several of the other
16 GFDP enrollees etc.);

17 d. approximately 30 hours preparing for, traveling to, and attending mediation, the
18 judicial settlement conference, and my deposition;

19 e. approximately 10 hours reviewing and approving court filings and providing testimony
20 in support thereof.

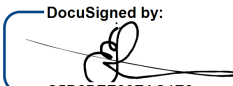
21 3. I respectfully request that the Court issue an order awarding me an incentive payment
22 in the amount of \$7,000, pursuant to the terms of the Class Settlement Agreement. I believe this
23 amount to be reasonable, fair, and appropriate based on my contributions to this case.

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

28

DocuSigned by:

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Edwin Ramirez