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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 IVAN RONCERIA IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND
INCENTIVE AWARDS**

Date: February 14, 2020

Time: 2:00 p.m.

Courtroom: G

1 I, Ivan Ronceria, 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 6 to 8 hours investigating the circumstances surrounding the sudden
10 cessation of the GFDP;
11 b. approximately 4 to 6 hours conferring with the other Class Representatives regarding
12 finding and retaining legal counsel;
13 c. approximately 10 to 20 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 10 to 20 hours collecting and organizing evidence (e.g invoices, email
17 threads, WeChat messages, etc.);
18 e. approximately 5 to 10 hours reviewing and approving court filings and providing
19 testimony in support thereof.

20 3. I respectfully request that the Court issue an order awarding me an incentive payment
21 in the amount of \$5,000, pursuant to the terms of the Class Settlement Agreement. I believe this
22 amount to be reasonable, fair, and appropriate based on my contributions to this case.

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

25
26 Date: November 18, 2019

DocuSigned by:
Ivan Ronceria
83D91F5EC6DA4D3

Ivan Ronceria