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8 Attorneys for Plaintiffs and Settlement Class

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 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN FRANCISCO DIVISION**

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

16 Plaintiffs,

17 v.

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

21 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



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I, Ivan Ronceria, declare as follows:

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

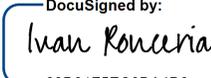
2. Both before and during the course of this lawsuit I worked diligently to assert claims and secure favorable settlement for the Class and myself. These efforts have included the following:

- a. Approximately 6 to 8 hours investigating the circumstances surrounding the sudden cessation of the GFDP;
- b. approximately 4 to 6 hours conferring with the other Class Representatives regarding finding and retaining legal counsel;
- c. approximately 10 to 20 hours corresponding or otherwise communicating with Class Counsel, the other Class Representatives, and members of the Settlement Class about this case;
- d. approximately 10 to 20 hours collecting and organizing evidence (e.g invoices, email threads, WeChat messages, etc.);
- e. approximately 5 to 10 hours reviewing and approving court filings and providing testimony in support thereof.

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

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

Date: November 18, 2019

DocuSigned by:

 83D91E5EC6DA4D3

 Ivan Ronceria