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Attorney for Defendants Jose Plehn-Dujowich  
and BizQualify LLC

Attorneys for Plaintiffs Class, Subclass, and  
FLSA Collective

**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-EDL

Honorable Elizabeth D. Laporte

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
CASE SCHEDULE THROUGH FINAL  
APPROVAL HEARING**



**STIPULATION AND ~~PROPOSED~~ ORDER**

Pursuant to the Court's Minute Entry of September 10, 2019 (Dkt. 104), which followed the hearing, on the same day, of the Joint Motion for Preliminary Approval of Class Action Settlement, Plaintiffs Qiuzi Hu, Edwin Ramirez, Ivan Ronceria, and Wenzhi Fei (collectively, "Plaintiffs"), and Defendants Jose M. Plehn-Dujowich ("Plehn-Dujowich") and BizQualify LLC ("BizQualify") (collectively, "Defendants") (Plaintiffs and the Defendants are hereinafter the "Parties"), by and through their respective counsel, stipulate to the following proposed case schedule through the Final Approval Hearing in this matter:

<b>Event</b>	<b>Date</b>
Deadline to Complete Class Notice	October 21, 2019
Deadline to File Application for Approval of Attorneys' Fees and Costs	November 18, 2019
Deadline to File Objections to Class Settlement/Submit Claim	December 20, 2019
Deadline to File Motion for Final Approval of Class Settlement	January 21, 2020
Final Approval Hearing	February 11, 2020

NOW THEREFORE, in light of the above, the Parties stipulate and request that the Court adopt the above case schedule through the Final Approval Hearing in this matter.

Dated: September 12, 2019

Respectfully submitted,

DHILLON LAW GROUP INC.

By: /s/ Harmeet K. Dhillon

Harmeet K. Dhillon

Gregory R. Michael

Attorneys for Plaintiffs, Class, Subclass, and FLSA Collective

1 Dated: September 12, 2019

KIEVE LAW OFFICES

2  
3 By: /s/ Loren Kieve  
Loren Kieve  
4 Attorney for Defendants Jose M. Plehn-Dujowich  
5 and BizQualify, LLC

6 **DECLARATION**

7 Pursuant to Local Rule 6-2, I declare under penalty of perjury under the laws of the United  
8 States that the foregoing is true and correct.

9 Dated: September 12, 2019

DHILLON LAW GROUP INC.

10  
11 By: /s/ Harmeet K. Dhillon  
Harmeet K. Dhillon  
12 Attorney for Plaintiffs

13 **ATTESTATION PER L.R. 5-1**

14 I, Harmeet K. Dhillon, hereby attest, pursuant to Local Rule 5-1, that the concurrence to the  
15 filing of this document has been obtained from each signatory hereto:

16  
17 Dated: September 12, 2019

By: /s/ Harmeet K. Dhillon  
Harmeet K. Dhillon (SBN: 207873)



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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 13, 2019



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Honorable Elizabeth D. Laporte  
United States Magistrate Judge