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Superior Court of California
County of Los Angeles

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Sherril R. Carter, Executive Officer/Clerk of Court

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Attorneys for Plaintiff, MELVIN DELGADO,
on behalf of himself and all others similarly situated and aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

MELVIN DELGADO, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

CUSTOM ALLOY SALES, INC., a California
corporation; SOUTHLAND EMPLOYMENT
SERVICES, INC., a California corporation;
VENSURE EMPLOYER SERVICES, INC., an
Arizona corporation; VENSURE HR, INC., an
Arizona corporation; SOUTH EAST
PERSONNEL LEASING, INC., a Florida
corporation; SOUTH EAST EMPLOYEE
LEASING SERVICES, INC., a Florida
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 20STCV26516

CLASS ACTION

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. FAILURE TO PAY OVERTIME WAGES;
2. FAILURE TO PAY MINIMUM WAGES;
3. FAILURE TO PROVIDE MEAL PERIODS
OR COMPENSATION IN LIEU THEREOF;
4. FAILURE TO PROVIDE REST PERIODS
OR COMPENSATION IN LIEU THEREOF;
5. FAILURE TO PAY DUE WAGES AT
TERMINATION;
6. WAGE STATEMENT VIOLATIONS;
7. VIOLATIONS OF LABOR CODE § 2802;
8. VIOLATION OF BUSINESS AND
PROFESSIONS CODE § 17200, *et seq.*;
9. CIVIL PENALTIES UNDER LABOR
CODE § 210;
10. CIVIL PENALTIES UNDER LABOR
CODE § 226.3;
11. VIOLATION OF LABOR CODE § 558;
12. VIOLATION OF LABOR CODE § 1174.5;
13. VIOLATION OF LABOR CODE § 1197.1;
and
14. CIVIL PENALTIES UNDER LABOR
CODE § 2699

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$25,000]