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VENTURA
SUPERIOR COURT
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of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF VENTURA

SERGIO DE LEON, an individual, on behalf
of himself and others similarly situated,

Plaintiff,

vs.

STG INTERNATIONAL, INC., a Virginia
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 2024CUOE020994

CLASS ACTION

Assigned for All Purposes To:

Hon. Benjamin F. Coats

Dept.: 43

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. Failure to Pay Minimum Wages;
2. Failure to Pay Wages and Overtime Under Labor Code § 510;
3. Failure to Pay Vacation Wages;
4. Failure to Comply with Labor Code § 245 *et seq.* and 246
5. Meal Period Liability Under Labor Code § 226.7;
6. Rest-Break Liability Under Labor Code § 226.7;
7. Violation of Labor Code § 226;
8. Violation of Labor Code § 203;
9. Failure to Reimburse Necessary Business Expenses under Labor Code § 2802;
10. Violation of Business & Professions Code § 17200 *et seq.*; and
11. Penalties pursuant to Labor Code § 2699, *et seq.*

DEMAND FOR JURY TRIAL

BY FAX