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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

Paula Self, Linda Duncan, Sheri Kiddy, Leslie Demull, Timothy Van Hoose, Michael Combs, Isabel Shelton, Ramy Ibrahim, Scott Wright, Wilda Sellers, Damon Hylton, Deyaska Spencer, Larry Clark, Lativia Williams, and Kevin Stagner Individually and on Behalf of Others Similarly Situated,

Plaintiffs,

vs.

TPUSA, Inc. and Teleperformance Group, Inc., Corporations,

Defendants.

**PLAINTIFFS' MOTION
FOR LEAVE TO FILE THE
THIRD AMENDED COMPLAINT**

Case No.: 2:08-CV-395 PMW

Judge: Hon. Paul M. Warner

Pursuant to Rule 15, Federal Rules of Civil Procedure, Representative Plaintiffs, Paula Self, Linda Duncan, Sheri Kiddy, Leslie Demull, Timothy Van Hoose, Michael Combs, Isabel Shelton, Ramy Ibrahim, Scott Wright, Wilda Sellers, Damon Hylton, Deyaska Spencer, Larry Clark, Lativia Williams, and Kevin Stagner ("Representative Plaintiffs"), by and through their attorneys Jesse S. Brar and Sharon L. Preston, hereby submit this Motion for Leave to File the Third Amended Complaint.

The Third Amended Complaint seeks to include additional Named and Representative Plaintiffs from the states of Idaho, New Mexico, and Pennsylvania. Additionally, the Third Amended Complaint includes claims under state wage and hour laws, breach of contract, and unjust enrichment for the states of Georgia, Idaho, New Mexico, and Pennsylvania.

Finally, the Third Amended Complaint seeks to drop the claim under Florida wage and hour law for unpaid non-overtime wages (Count 2 of the Second Amended Complaint). The proposed Third Amended Complaint is attached as Exhibit A.

Respectfully submitted, this 15th day of September, 2008.

/s/Jesse S. Brar
Jesse S. Brar
Sharon L. Preston
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on September 15, 2008, I electronically filed the foregoing Motion for Extension of Time with the Court using the CM/ECF system which sent notification of such filing to the following:

Gerry B. Holman
Leslie L. Abbott
Hannah J. Cole
Mary C. Dollarhide

/s/Jesse S. Brar
Sharon Preston
Attorney for the Plaintiffs