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15
16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18
19 WORLDWIDE WATER INC. and
WORLDWIDE WATER LLP,

20 Plaintiffs,

21 v.

22 LIQUID-AIR, INC., a
23 corporation, NICK WELLS, an
individual, BERNARD SYAUTA, an
24 individual, GREGORY CAMERON,
an individual, BUDHI HARYANTO,
25 an individual, and FUJIAN YUXIAN
ELECTRONIC EQUIPMENT CO.,
26 LTD, a limited liability company

27 Defendants.
28

Case No.

COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF --
PATENT INFRINGEMENT

DEMAND FOR TRIAL BY JURY

FILED
2003 JAN 29 PM 2:35
CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

1 Plaintiffs WORLDWIDE WATER, INC., a corporation, and
2 WORLDWIDE WATER LLC, a limited liability company, bring this
3 Complaint against defendants LIQUID-AIR, INC., a Utah corporation,
4 NICK WELLS, an individual, BERNARD SYAUTA, an individual,
5 GREGORY CAMERON, an individual, BUDHI HARYANTO, an individual,
6 and FUJIAN YUXIAN ELECTRONIC EQUIPMENT CO.,LTD, a limited
7 liability company, alleging as follows:

8
9 **JURISDICTION**

- 10 1. The court has original subject matter jurisdiction over the
11 cause of action in this case for patent infringement under 28
12 U.S.C. Section 1338(a).

13
14 **VENUE**

- 15 2. Defendants LIQUID-AIR, INC., a Utah corporation, NICK
16 WELLS, an individual, BERNARD SYAUTA, an individual,
17 GREGORY CAMERON, an individual, BUDHI HARYANTO, an
18 individual, and FUJIAN YUXIAN ELECTRONIC EQUIPMENT
19 CO.,LTD, a limited liability company, have each committed
20 acts of infringement of plaintiffs' patents within the Central
21 District of California and the County of Los Angeles, State of
22 California, which acts of infringement form the basis of the
23 Complaint in this case. Defendants each have a regular and
24 established place of business in the County of Los Angeles,
25 State of California. Venue of this case is proper in this Central
26 District of California under 28 U.S.C. § 1400(b).

1 founders of defendant LIQUID-AIR, INC., created and is in a
2 partnership with defendant LIQUID-AIR, INC. to manufacture,
3 import and sell water generating machines that violate plaintiffs'
4 patents, and has an agent, employee or officer regularly
5 assigned to the County of Los Angeles, State of California for
6 that purpose.

- 7
- 8 7. Defendants LIQUID-AIR, INC., a Utah corporation, NICK
9 WELLS, an individual, BERNARD SYAUTA, an individual,
10 GREGORY CAMERON, an individual, BUDHI HARYANTO, an
11 individual, and FUJIAN YUXIAN ELECTRONIC EQUIPMENT
12 CO.,LTD, a limited liability company, are each the employees,
13 agents, partners, successors, joint venturers, co-conspirators
14 and assigns of each other, and their acts are done with the
15 authorization, authority and approval of each other as part of
16 that common employment, agency, partnership, joint venture,
17 conspiracy or joint and mutual assignment.

18

19 **ALLEGATIONS OF PATENT INFRINGEMENT**

- 20 8. Plaintiff WORLDWIDE WATER INC. is the assignee and
21 holder of the following United States Patents No. 5,669,221,
22 No. 5,845,504, No. 6,058,718, and No. 6,182,453, for a
23 portable, potable-water generator that produces high-purity
24 liquid water by condensation of humidity from ambient air --
25 commonly called the water generating machine.
- 26
- 27 9. Plaintiff WORLDWIDE WATER LLC is an exclusive licensee

1 having all substantial rights under the following United States
2 Patents No. 5,669,221, No. 5,845,504, No. 6,058,718, and
3 No. 6,182,453, for the water generating machine.
4

5 10. Defendants LIQUID-AIR, INC., a corporation, NICK WELLS,
6 an individual, BERNARD SYAUTA, an individual, GREGORY
7 CAMERON, an individual, BUDHI HARYANTO, an individual,
8 and FUJIAN YUXIAN ELECTRONIC EQUIPMENT CO.,LTD,
9 a limited liability company, obtained access to the design and
10 specifications for plaintiffs' aforementioned water generating
11 machine, and copied that design and specifications, and are
12 now making, importing, selling and offering to sell water
13 generating machines that violate the patents held by the
14 plaintiffs, including U.S. Patents No. 5,669,221, No. 5,845,504,
15 No. 6,058,718, and No. 6,182,453.

16
17 11. The water generating machines being manufactured, imported,
18 sold and offered for sale by defendants LIQUID-AIR, INC., a
19 corporation, NICK WELLS, an individual, BERNARD SYAUTA,
20 an individual, GREGORY CAMERON, an individual, BUDHI
21 HARYANTO, an individual, and FUJIAN YUXIAN
22 ELECTRONIC EQUIPMENT CO.,LTD, a limited liability
23 company, infringe literally or by equivalents on the patents held
24 plaintiffs, including U.S. Patents No. 5,669,221, No. 5,845,504,
25 No. 6,058,718, and No. 6,182,453, and embody claims
26 contained in those patents.
27

1 12. Defendants' infringement of plaintiffs' patents has been willful
2 and wanton. Defendants' copying of plaintiffs' patented water
3 generating machines is deliberate. Defendants had actual
4 notice of plaintiffs' patents, and investigated those patents and
5 their scope, and once they investigated those patents, they
6 engaged in a pattern of subterfuge and pretense to conceal
7 their violations of those patents belonging to plaintiffs.
8

9 13. Plaintiffs have provided actual notice of their patents and
10 defendants' infringement thereof to defendants, who
11 nonetheless continue with their infringement, which
12 infringement is done without the consent of plaintiffs and will
13 continue unless enjoined by this Court.
14

15 14. Defendants infringement of plaintiffs' patents has irreparably
16 damaged plaintiffs, in an amount and manner according to
17 proof, and will cause added injury and loss unless and until
18 enjoined by this Court.
19

20 **DEMAND FOR RELIEF**

21 WHEREFORE, plaintiffs WORLDWIDE WATER INC., a
22 corporation, and WORLDWIDE WATER LLC, a limited liability company,
23 ask this Court to:

- 24 a. Enter judgment for the Plaintiffs on this Complaint;
25 b. Enter a preliminary and permanent injunction to enjoin
26 Defendants LIQUID-AIR, INC., a Utah corporation, NICK
27 WELLS, an individual, BERNARD SYAUTA, an individual,
28

1 GREGORY CAMERON, an individual, BUDHI HARYANTO, an
2 individual, and FUJIAN YUXIAN ELECTRONIC EQUIPMENT
3 CO.,LTD, a limited liability company, and those in privity with or
4 acting in concert with them, from further infringement of
5 plaintiffs' patents during the remainder of the term for which
6 those patents have been granted;

- 7 c. Award Plaintiffs damages against Defendants adequate to
8 compensate Plaintiffs for such acts of infringement and to
9 increase the damages to three times the amount found or
10 assessed in accordance with 35 U.S.C. § 284;
11 d. Award Plaintiffs their reasonable attorneys' fees in accordance
12 with 35 U.S.C. § 285;
13 e. Award Plaintiffs interest and costs; and
14 f. Award Plaintiffs such other and further relief as is just and
15 proper.

16
17 **JURY DEMAND**

18 Plaintiffs hereby demand a trial by jury of all issues so triable.

19 DATED: January 22, 2003

20 JOHN C. TORJESEN
21 & ASSOCIATES

22
23 By 

24 John C. Torjesen
25 Attorneys for Plaintiffs
26 WORLDWIDE WATER INC.
27 WORLDWIDE WATER LLC.
28

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601 Wilshire Boulevard, Suite 2000
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Worldwide Water, Inc., Worldwide Water
Plaintiff(s)
v.
Quick-Air, a corporation, Nick Wells,
individual, *See Attached*
Defendant(s)

CASE NUMBER:
CV- 03-042 PA

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney
John C. Torjesen & Associates, whose address is:

1601 Wilshire Boulevard, Suite 2000
Los Angeles, California 90025

Answer to the complaint _____ amended complaint counterclaim cross-claim
which is herewith served upon you within 20 days after service of this Summons upon you, exclusive
of the day of service. If you fail to do so, judgment by default will be taken against you for the relief
demanded in the complaint.

CLERK, U.S. DISTRICT COURT

KERRI GLOVER

By: _____
Deputy Clerk

(Seal of the Court)

