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14 Attorneys for Plaintiffs

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  
24 individual, BERNARD SYAUTA, an  
25 individual, GREGORY CAMERON,  
26 an individual, BUDHI HARYANTO,  
an individual, and FUJIAN YUXIAN  
ELECTRONIC EQUIPMENT CO.,  
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 2:33  
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).  
27

1                                    **PARTIES AND PERSONAL JURISDICTION**

2                                    3.    Plaintiff WORLDWIDE WATER INC. is a Texas corporation  
3                                    having its principal place of business in the State of Texas.  
4                                    Plaintiff WORLDWIDE WATER LLC is a Nevada limited  
5                                    liability company having its principal place of business in the  
6                                    State of California.

7  
8                                    4.    Defendant LIQUID-AIR, INC. is a Utah corporation residing  
9                                    and having its principal place of business in the County of Los  
10                                    Angeles, State of California.

11  
12                                    5.    Defendants NICK WELLS, an individual, BERNARD SYAUTA,  
13                                    an individual, GREGORY CAMERON, an individual, BUDHI  
14                                    HARYANTO, an individual, formed the defendant LIQUID-AIR,  
15                                    INC., a corporation, in response to learning of plaintiffs' patent  
16                                    rights in this case in an attempt to circumvent those rights. The  
17                                    individual defendants formed defendant LIQUID-AIR, INC. for  
18                                    the purpose of engaging in conduct that violates plaintiffs'  
19                                    patent rights in this case. These individual defendants NICK  
20                                    WELLS, BERNARD SYAUTA, GREGORY CAMERON and  
21                                    BUDHI HARYANTO reside in or otherwise have a regular and  
22                                    established place of business in the County of Los Angeles,  
23                                    State of California.

24  
25                                    6.    Defendant FUJIAN YUXIAN ELECTRONIC EQUIPMENT  
26                                    CO.,LTD, is a foreign, limited liability company, has its principal  
27                                    place of business in China, assigned an agent to be one of the

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

John C. Torjesen & Associates  
601 Wilshire Boulevard, Suite 2000  
Los Angeles, California 90012  
Tel: 473-3828

**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)

