

COPY

UNFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

JAN 6 2006

John A. Clarke, Executive Officer/Clerk

By C. Ferrafino, Deputy

1 RICHARD G. SHERMAN, ESQ. (CSBN 31098)
2 ROBERT E. YOUNG, ESQ. (CSBN 54863)
3 149 South Barrington Avenue
4 Los Angeles, California 90049
5 Tel: (310) 440-5647
6 Fax: (310) 471-8778

7 LONGO & LONGO, LLP
8 Lawrence M. Longo (SBN 43519)
9 Frank J. Longo, Esq. (SBN 175519)
10 280 S. Beverly Dr., Suite #210
11 Beverly Hills, CA 90212
12 Tel: (310) 271-9388
13 Fax (310) 271-9194

14 Attorneys for Plaintiff WORLDWIDE WATER, LLC

DATE OF HEARING

4-28-06

IN DEPT. WE

M

11 SUPERIOR COURT FOR THE COUNTY OF LOS ANGELES
12 FOR THE STATE OF CALIFORNIA

14 WORLDWIDE WATER, LLC,
15 Plaintiff,

16 v.

17 AIRWATER CORPORATION, a Florida
18 corporation; MICHAEL ZWEBNER, an
19 individual; FUJIAN YUXIN ELECTRONIC
20 EQUIPMENT CO., LTD, a Chinese
21 corporation; HENDRX CORP., a Nevada
22 corporation; and DOES 1 through 50,
23 inclusive,

24 Defendants.

CASE NO. 50088178

COMPLAINT FOR DAMAGES:

- 1. BREACH OF CONTRACT
- 2. BREACH OF FIDUCIARY DUTY
- 3. FRAUD
- 4. INDUCEMENT TO BREACH CONTRACT
- 5. CONSPIRACY

DEMAND FOR JURY TRIAL

22 COMES NOW Plaintiff who complains and alleges against Defendants, and each of
23 them, as follows:

24 1. Plaintiff WORLDWIDE WATER, LLC (variously "WWL" or "Plaintiff") is a
25 limited liability company duly organized under the laws of the Nevada and qualified to do
26 business in and doing business in the County of Los Angeles, the State of California.

1 did the acts and things as herein alleged, as and when alleged, pursuant to and in furtherance of
2 the conspiracy.

3 51. The foregoing acts of Defendants, and each of them, were part of a common and
4 continuous pattern of misconduct, all done with fraud, malice and oppression, and a conscious
5 disregard for Plaintiff's rights, perpetrated with the intent to vex, injure, harass and annoy
6 Plaintiff. Defendants intended to cause injury to Plaintiff while subjecting it to unjust and unfair
7 hardship. As such, Plaintiff is entitled to exemplary and punitive damages against Defendants in
8 a sum to be proved at trial herein.

9 WHEREFORE Plaintiff prays for judgment against Defendants, and each of them, as
10 follows:

- 11 1. For compensatory damages in the amount in an amount in excess of \$1,000,000,
12 plus legal interest as allowed by law;
- 13 2. For exemplary and punitive damages in an amount to be proved at trial herein;
- 14 3. For reasonable attorney's fees;
- 15 4. For costs of suit incurred herein;
- 16 5. For such other and further relief as to the Court may seem just and proper.

17 Dated: January 4, 2006

18
19 By: 

RICHARD G. SHERMAN.
Attorneys for Plaintiff