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FILED
CLERK, U.S. DISTRICT COURT
DEC 16 2005
CENTRAL DISTRICT OF CALIFORNIA
BY DEPUTY

"BY FAX"

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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

13 WORLDWIDE WATER, INC., ET AL.,
14 Plaintiffs,
15 v.
16 LIQUID AIR, INC., ET AL.,
17 Defendants.

CV-03-642-DSF-(AJWx)
Judgment by Stipulation [Proposed]

ENTERED
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18 AND RELATED COUNTERCLAIM

19 The parties through their counsel stipulate to the following judgment.

20
21 1. This is a suit for patent infringement, with plaintiffs alleging that defen-
22 dants' LA-1 water machine infringes their United States Patents Nos. 5,669,221 (the
23 '221 patent'), 5,845,504 (the '504 patent'), 6,058,718 (the '718 patent'), and
24 6,182,453 (the '453 patent') (collectively the "Patents in Suit"), seeking damages and
25 injunctive relief. Defendants counter-claimed alleging that they had rights in the Pat-
26 ents in Suit by assignment from Terry LeBleu and that the Patents in Suit were inva-
27 lid and unenforceable because of inequitable conduct by plaintiffs and by applicants
28 for the patents in suit

1 2. This court has jurisdiction pursuant to 28 U.S.C. § 1338(a).

2
3 3. Plaintiff and counterdefendant Worldwide Water, Inc., ("WWW - Inc.") is
4 a Texas corporation with its principal place of business in California. Plaintiff and
5 counterdefendant Worldwide Water, L.L.C. ("WWW - LLC") is a Nevada limited li-
6 ability company with its principal place of business in California.

7
8 4. Defendant and counterclaimant Liquid-Air, Inc. ("Liquid Air") is a Utah
9 corporation with its principal place of business located in California. Defendants and
10 counterclaimants Nick Wells ("Wells"), Bernard Syauta ("Syauta"), Gregory Cam-
11 eron ("Cameron") and Budhi Haryanto ("Haryanto") are individuals. Liquid Air,
12 Wells, Syauta, Cameron and Haryanto are collectively referred to as Defendants. This
13 court has personal jurisdiction over the Defendants and venue is proper.

14
15 5. The plaintiffs WWW - Inc. and WWW - LLC own each of the Patents in
16 Suit, namely: United States Patents Nos. 5,669,221 (the '221 patent"), 5,845,504 (the
17 '504 patent"), 6,058,718 (the '718 patent"), and 6,182,453 (the '453 patent"). No de-
18 fendant has any right, title, interest or license in any of these Patents in Suit.

19
20 6. As between the parties, the Patents in Suit are valid and enforceable.
21 "Valid" means that the United States Patent and Trademark Office correctly issued
22 the patents. "Enforceable" means that the patent applicants and their attorneys did not
23 violate their duty of candor to the United States Patent and Trademark Office.

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25 7. Defendants will no longer manufacture or produce the LA-1 water ma-
26 chine.

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28 8. Each party shall bear their own costs and attorneys fees.

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9. All remaining claims and counterclaims are dismissed with prejudice.

October 10, 2005

Michael Harris
Michael D. Harris
KLEINBERG & LERNER, LLP

Attorneys for Defendants Liquid-Air, Inc.,
N. Wells, B. Syauta, G. Cameron and B.
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October __, 2005

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IT IS SO ORDERED.

Dated: 12-16, 2005

Dale Lescher

Judge