FILED: NEW YORK COUNTY CLERK 04/14/2017 03:32 PM

NYSCEF DOC. NO. 1

INDEX NO. 652024/2017

RECEIVED NYSCEF: 04/14/2017

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

-----X CHEN DONGWU, CHEN WEN, CHEN ZIWEI, CHENG GUANWEN, CHENG JIE, CHENG LING, DU ERQIN, FENG BING, GU BEIBEI, GUAN ZHIJUN, HAN LIDA, HE CHUNHUA, HOU JIN, HU JIANJUN, HU XINGNING, HU ZHENGFU, HU ZHONGYONG, HUANG GUI MING, HUANG YING, JI TONG, JIAN ZAIHONG, JIANG YUANSHEN, KUANG SUPING. LEI MINGCHUN, LI CHAO YANG, LI FEIFEI, LI JINLIANG, LI NING, LI WANSHAN, LI WEI, LI WEI, LI XIAOLIN, LI YINGJU, LI ZHI HUI, LIN SENG, LING HAO, LING YAHUA, LIU OING ZHU, LIU WEI WEI, LIU XIAO JUN, LIU YING, LU KUI, LU RUI, LU YUANQING, MA BING, MA JIFEI, MIAO SHU, NI QIAO, QI XIAOMEI, QU XIAOYAN, PAN CHENG, PAN YUE XIA, REN JINGYAN, REN TAO, RUAN WEIWEN, SHEN CHAOJUN, SHENG DONG LIN, SHI BING, SUN LIANGGUI, SUN PING, TAN DAMING, TANG MINGSHAN, TANG WENWEN, TAO LANLAN, TIAN XIAOYUN, WANG GUOLIANG, WANG YUN, WANG ZHOU JI, WEI FANG, WEI ZHEN, WU LING, XIA YUN, XIE SHISHI, XU YONGLIANG, XU ZEYUAN, YAN TAO,

YAN XIAO XIN, YANG JIAN HUA, YANG YONG JI, YANG YUE, YOU JUN, ZHAN BIHUA, ZHANG JUAN, ZHANG JUNYI, ZHANG PU, ZHANG YAN,

CHUNYING, ZHOU BAI, ZHOU LIANCHUN, ZHOU

ZHANG YIHONG, ZHANG ZHIMIN, ZHAO

YAN, ZHU JIANAN, ZHU WEITE, ZHUANG

Plaintiffs,

-against-

ZHENGWEI, and ZOU LIANG,

NEW YORK CITY REGIONAL CENTER LLC, GEORGE L. OLSEN, and PAUL LEVINSOHN,

Defendants.	
 	X

To the above-named Defendants:

#7073734 v3 \024119 \0015

Index No.

Date Purchased:

SUMMONS WITH NOTICE

Plaintiff designate New York County as the place of trial.

The basis of venue is CPLR 503 and because various plaintiffs reside in New York and the defendants reside in New York.

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YOU ARE HEREBY SUMMONED to answer the Complaint in this action and

to serve a copy of an answer, or, if the Complaint is not served with this summons, to serve a

notice of appearance, on the Plaintiffs' attorneys within twenty (20) days after the service of this

summons, exclusive of the day of service (or within thirty (30) days after the service is complete,

if this summons is not personally delivered to you within the State of New York); and in case of

your failure to appear or answer, judgment will be taken against you by default for the relief

demanded herein.

NOTICE: The nature of this action is for, *inter alia*, Common Law Fraud,

Breaches of Fiduciary Duties, Aiding and Abetting Fraud, Aiding and Abetting Breaches of

Fiduciary Duties, Breaches of the Operating Agreement, Tortious Inducement of Breach of the

Operating Agreement, Breaches of the Implied Covenant of Good Faith and Fair Dealing,

Negligent Misrepresentation, Negligence, Violation of the New York Limited Liability Company

Law, Unjust Enrichment, as well as for an Accounting and for other legal and equitable relief in

connection with the Defendants' wrongful conduct in connection with the New York City East

River Waterfront Development Fund, LLC.

Plaintiffs seek, inter alia, monetary damages, including compensatory damages,

the disgorgement of profits, punitive damages and equitable relief, in an amount to be proven at

trial but believed to exceed \$177,000,000.

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In case of your failure to appear or answer in this action, judgment will be taken against you by default for the relief demanded herein and the costs of this action.

Dated: New York, New York April 14, 2017

Respectfully submitted

MORRISON COHEN LLP

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David B. Saxe Jason P. Gottlieb

Mark S. Jarashow

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Attorneys for Plaintiffs

TO: NEW YORK CITY REGIONAL CENTER, LLC

99 Hudson Street 15th Floor New York, New York, 10013

GEORGE L. OLSEN 138 Reade Street, Fl. 3 New York, New York 10013

PAUL A. LEVINSOHN 153 Chambers Street, Apt. 5 New York, New York 10007

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YORK COUNTY **CLERK** 04/14/2017 03: 32 PM

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COUNTY OF NEW YORK SUPREME COURT OF THE STATE OF NEW YORK

BEIBEI, GUAN ZHIJUN, HAN LIDA, HE CHUNHUA, HOU JIN, HU JIANJUN, HU XINGNING, HU ZHENGFU, HU ZHONGYONG, HUANG GUI MING, HUANG YING, JI TONG, JIAN ZAIHONG, JIANG YUANSHEN, KUANG SUPING, LEI MINGCHUN, LI CHAO YANG, LI FEIFEI, LI JINLIANG, LI NING, LI WANSHAN, LI WEI, LI WEI, LI XIAOLIN, LI YINGJU, LI ZHI HUI, LIN SENG, LING ZHIMIN, ZHAO CHUNYING, ZHOU BAI, ZHOU LIANCHUN, ZHOU YAN, ZHU JIANAN, ZHU WEITE, ZHUANG ZHENGWEI, AND WU LING, XIA YUN, XIE SHISHI, XU YONGLIANG, XU ZEYUAN, YAN TAO, YAN XIAO XIN, YANG JIAN HUA, YANG YONG JI, YANG YUE, YOU JUN, ZHAN BIHUA, ZHANG JUAN, ZHANG JUNYI, ZHANG PU, ZHANG YAN, ZHANG YIHONG, ZHANG TANG WENWEN, TAO LANLAN, TIAN XIAOYUN, WANG GUOLIANG, WANG YUN, WANG ZHOU JI, WEI FANG, WEI ZHEN JIFEI, MIAO SHU, NI QIAO, QI XIAOMEI, QU XIAOYAN, PAN CHENG, PAN YUE XIA, REN JINGYAN, REN TAO, RUAN WEIWEN, SHEN CHAOJUN, SHENG DONG LIN, SHI BING, SUN LIANGGUI, SUN PING, TAN DAMING, TANG MINGSHAN, HAO, LING YAHUA, LIU QING ZHU, LIU WEI WEI, LIU XIAO JUN, LIU YING, LU KUI, LU RUI, LU YUANQING, MA BING, MA CHEN DONGWU, CHEN WEN, CHEN ZIWEI, CHENG GUANWEN, CHENG JIE, CHENG LING, DU ERQIN, FENG BING, GU

ZOU LIANG,

NEW YORK CITY REGIONAL CENTER LLC, GEORGE L. OLSEN, AND PAUL LEVINSOHN

Plaintiffs

Defendants

ATTORNEYS FOR PLAINTIFFS

SUMMONS WITH NOTICE

Morrison Cohen...

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