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FILED
LOS ANGELES SUPERIOR COURT

AUG 26 2008

JOHN A. CLARKE, CLERK

BY SHAUNIA WESLEY, DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 ALEJANDRO ARTIGAS, an individual,

12 Plaintiff,

13 vs.

14 NORTH LAS PALMAS, LLC, a
California limited liability company,
15 SAMI HAYEK, an individual, and
SALMA HAYEK, an individual,

16 Defendants.

Case No. EC396663

COMPLAINT FOR INVOLUNTARY
DISSOLUTION OF LIMITED LIABILITY
COMPANY AND APPOINTMENT OF A
RECEIVER

18 Plaintiff, Alejandro Artigas ("Artigas") alleges as follows:

19 1. Plaintiff is, and at all times relevant hereto was, a member and co-manager
20 of defendant North Las Palmas, LLC.

21 2. Defendant North Las Palmas, LLC is, and at all times relevant hereto was,
22 a limited liability company duly organized and existing under and by virtue of the
23 the State of California, having its principal place of business in the County of
24 Angeles, State of California.

25 3. Defendant Sami Hayek is, and at all times relevant hereto was,
26 and co-manager of defendant limited liability company.

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COMPLAINT FOR INVOLUNTARY DISSOLUTION OF LIMITED LIABILITY COMPANY AND APPOINTMENT OF A RECEIVER

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Dep't 48 William F. Friley

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1 4. Defendant Salma Hayek is, and at all times relevant hereto was, a member
2 of defendant limited liability company.

3 5. On or about June 13, 2008, defendant Sami Hayek wrongfully sought to
4 remove plaintiff Artigas as a co-manager of defendant limited liability company.

5 6. Dissolution of defendant limited liability company is reasonably necessary
6 to protect the rights and interests of plaintiff Artigas.

7 7. The management of defendant limited liability company is deadlocked and
8 subject to internal dissention.

9 8. Defendant Sami Hayek has been guilty of, or has knowingly countenanced,
10 persistent and pervasive fraud, mismanagement, and/or abuse of authority.

11 9. Unless a receiver is appointed to take over and manage the business and
12 affairs of defendant limited liability company and to preserve its property during the
13 pendency of this action, the interests of both defendant limited liability company and its
14 members will suffer because defendant limited liability company has an even number of
15 managers who are equally divided and cannot agree as to the management of its affairs,
16 and the entire management of defendant limited liability company has broken down.

17 WHEREFORE, plaintiff Artigas prays for judgment as follows:

18 1. that the Court decree a winding up and dissolution of defendant limited
19 liability company;

20 2. that the Court entertain such proceedings as may be necessary or proper
21 for the involuntary winding up or dissolution of defendant limited liability company and, in
22 that regard, make such orders for winding up and dissolution of defendant limited liability
23 company as justice and equity may require;

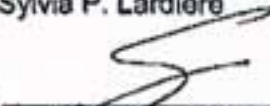
24 3. that a receiver be appointed to take over and manage the business and
25 affairs of defendant limited liability company and to preserve its property pending the
26 hearing and determination of this complaint for dissolution;

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- 4. for costs of suit incurred herein; and
- 5. for such other and further relief as the Court deems just and proper.

Dated: August 19, 2008

DREIER STEIN KAHAN BROWNE WOODS
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Edward A. Woods
Sylvia P. Lardiere

BY 
Sylvia P. Lardiere

Attorneys for Plaintiff
Alejandro Artigas

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