

EXHIBIT G

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

KATHRYN COX; BEVERLY HAWLEY and
RICHARD HAWLEY, husband and wife;
WILLIAM MARK SMITH and NADINE
SMITH, husband and wife; CHERYL GRANT;
JILL ORTIZ; THOMAS PRIGMORE and
SATOKO PRIGMORE, husband and wife;
ROBERT WALLA and KRISTINE WALLA,
husband and wife; DARYL STUART and
LAUREL STUART, husband and wife;
DOUGLAS SUNDBY and CYNDI SUNDBY,
husband and wife; CHRIS STUART; MEGAN
WALLA; THOMAS HUBER; DAVID HUBER;
DANIEL O'NEAL and PATRICIA O'NEAL,
husband and wife, DALE HOLLINGSWORTH
and RUTH HOLLINGSWORTH, husband and
wife; SARAH HOLLINGSWORTH; NICOLE
TIEDEMAN and DERRY TIEDEMAN, husband
and wife; TRACY ZICKUHR and SANDY
ZICKUHR, husband and wife, and ZOE
ZICKUHR,

Plaintiffs,

v.

TOG-POP, LLC a/k/a TOG-POP, LLC-SERIES
SHORELINE REAL ESTATE, a Delaware
limited liability company; HENRI and
SHARON DUYZEND and their marital
community,

Defendants.

NO. 11-2-31164-3 SEA

FIRST AMENDED COMPLAINT FOR
UFTA AND OTHER RELIEF

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2 Plaintiffs state and allege as follows:

3 I. PARTIES

4 1.1 Plaintiffs are current or former residents of Washington.

5 1.2 Defendant TOG-POP, LLC a/k/a TOG-POP, LLC-SERIES SHORELINE
6 REAL ESTATE is believed to be a Delaware limited liability operating in King County, State
7 of Washington.

8 1.3 Defendants Henri F. Duyzend, DDS and Sharon Duyzend, husband and wife,
9 are residents of the State of Washington. Dr. Henri Duyzend was a licensed dentist who was
10 practicing dentistry in Shoreline, King County, Washington at all times material to this case.

11 II. VENUE AND JURISDICTION

12 2.1 Venue and jurisdiction are properly before the above-entitled Court since
13 defendants reside therein.

14 III. FACTS

15 3.1 In September 2011, plaintiffs commenced a lawsuit against Henri Duyzend,
16 D.D.S. and Sharon Duyzend, husband and wife, in King County Superior Court, Cause No. 11-
17 2-31164-3 SEA, and on July 25, 2013, the Court confirmed an arbitration award and entered
18 judgment against the Duyzends in the sum of \$35,212,000.00.

19 3.2 Upon reviewing Debtors' financial records, it was discovered that the Duyzends
20 formed defendant TOG-POP, LLC and transferred to it various assets.

21 IV. FIRST CAUSE OF ACTION

22 (UFTA)

23 4.1 At all times relevant, the Duyzends were either shareholders, officers, persons in
24 control and/or possessed a financial interest in TOG-POP, LLC.

1 4.2 On information and belief, the Duyzends transferred certain assets to defendant.
2 TOG-POP, LLC

3 4.3 The Duyzends made such transfers to TOG-POP, LLC with intent to hinder,
4 delay and/or defraud creditors of the Duyzends, or alternately made such transfers without
5 reasonably equivalent value.

6 4.4 At the time of such transfers, the Duyzends were insolvent or were engaged in
7 or were about to be engaged in a business and transaction for which the remaining assets of the
8 Duyzends were unreasonably small or nonexistent in relation to the business and transaction.

9 4.5 As a direct and proximate result of the Duyzends' actions and/or omissions
10 described herein, the Duyzends and defendant TOG-POP, LLC have violated the various
11 provisions of Washington's Uniform Fraudulent Transfer Act statute, RCW 19.40 et seq. and
12 defendants are liable to plaintiffs for damages in amounts to be proven at trial, as the initial
13 transferee and/or entity for whose benefit the transfers were made.

14 WHEREFORE, plaintiffs pray for the following relief:

15 A. Judgment against defendant TOG-POP, LLC a/k/a TOG-POP, LLC-SERIES
16 SHORELINE REAL ESTATE, a Delaware limited liability company, in an amount to be
17 proven at trial, plus prejudgment interest, attorney fees and costs as authorized by law and
18 RCW 4.84 et seq.; and

19 B. For such other and further relief as the Court deems just and equitable.

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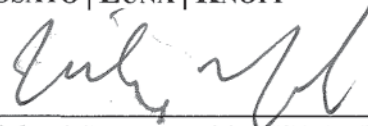
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1 DATED this _____ day of _____, 2013.

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3 **PETERSON | WAMPOLD**
4 **ROSATO | LUNA | KNOPP**

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6 Michael S. Wampold, WSBA No. 26053
7 Ann H. Rosato, WSBA No. 32888
8 Mallory C. Allen, WSBA No. 45468
9 Attorneys for Plaintiffs
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