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Attorneys for Plaintiff Sundesa, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SACV13 - 01086 JVS (JPRx)

Sundesa, LLC, a Utah Limited Liability
Company,

Plaintiff,

v.

Clean Designs, LLC, a California Limited
Liability Company,

Defendant.

Civil Action No. _____

**COMPLAINT FOR PATENT
INFRINGEMENT**

[Demand For Jury Trial]

BY FAX

FILED
2013 JUL 19 AM 10:56
CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

1 Plaintiff Sundesa, LLC (“Sundesa”) complains against defendant Clean Designs,
2 LLC, d/b/a Clean Bottle (“Clean Bottle”) for the causes of action alleged as follows:

3 **THE PARTIES**

4 1. Sundesa is a limited liability company duly organized and existing under the
5 laws of the State of Utah, with its principal place of business located at 284 South 700
6 West, Pleasant Grove, Utah 84062.

7 2. Sundesa alleges Clean Bottle is a Limited Liability Company organized and
8 existing under the laws of the State of California with its principal place of business
9 located at 130 Lucero Way, Portola Valley, California 94028.

10 **JURISDICTION AND VENUE**

11 3. This is a civil action for patent infringement arising under the patent laws of
12 the United States 35 U.S.C. §§ 1 *et seq.*, including 35 U.S.C. § 271.

13 4. This Court has original jurisdiction over the subject matter of this action
14 under at least 28 U.S.C. §§ 1331 and 1338(a).

15 5. This Court has personal jurisdiction over Clean Bottle because Clean Bottle
16 has purposely availed itself of the privileges and benefits of the laws of the State of
17 California and has committed acts of patent infringement within this judicial District.

18 6. Defendant does, and has done, substantial business in this judicial District,
19 including: (i) committing acts of patent infringement in this judicial District and
20 elsewhere in California; (ii) regularly doing business or soliciting business by virtue of
21 Defendant’s nationwide, interactive and commercial website which directs Defendant’s
22 services and products to California; (iii) establishing its headquarters in California; (iv)
23 selling its products through local and national retailers in the state of California including
24 REI, GNC, and Big 5 Sporting Goods; and (v) engaging in other persistent courses of
25 conduct, and/or deriving substantial revenue from products and/or services provided to
26 persons in this District and State.

27 7. This Court’s exercise of personal jurisdiction over Clean Bottle is consistent
28 with the Constitutions of the United States and the State of California.

1 8. Venue is proper in this judicial district under at least 28 U.S.C. §§ 1391 and
2 1400.

3 **FACTUAL BACKGROUND**

4 9. Sundesa's technological innovations are protected by, *inter alia*, a portfolio
5 of utility and design patents, including United States Utility Patent No. 6,379,032 (the
6 "'032 Patent").

7 10. Sundesa is an exclusive licensee of the '032 Patent and has been granted all
8 rights thereunder, including the right, and standing, to enforce the '032 Patent.

9 11. Clean Bottle is in the business of manufacturing and selling sports and
10 fitness drink bottles. In particular, Clean Bottle provides Clean Bottles with a mixing
11 whisk ball that allows users to mix ingredients together by placing them in a Clean Bottle
12 together with a mixing whisk (the "Accused Products").

13 12. By its design, manufacture, and sales of the Accused Products, Clean Bottle
14 encourages and instructs users to mix ingredients using the Accused Products.

15 13. Clean Bottle both sells the Accused Products and offers them for sale.

16 14. Clean Bottle markets, describes, and instructs its customers to use the
17 Accused Products to mix ingredients together in such a way as to perform the claimed
18 methods of the '032 Patent.

19 15. On July 18, 2013, Sundesa's attorneys sent Clean Bottle a letter informing
20 Clean Bottle of its infringement of the '032 Patent.

21 16. Clean Bottle has had knowledge of the '032 Patent since at least about July
22 18, 2013.

23 17. Since learning of the '032 Patent, Clean Bottle has continued to infringe the
24 '032 Patent.

25 18. Use of any of the Clean Bottle's Accused Products infringes the '032 Patent.

26 19. The Accused Products are used for mixing ingredients and do not have any
27 substantial use other than allowing the user to perform the methods claimed in the '032
28 Patent.

1 20. The Accused Products have no substantial non-infringing uses.

2 **FIRST CLAIM FOR RELIEF**

3 **(Infringement of the '032 Patent)**

4 21. By this reference Sundesa realleges and incorporates the foregoing
5 paragraphs as though fully set forth herein.

6 22. Clean Bottle has directly infringed, and continues to directly infringe, the
7 '032 Patent under 35 U.S.C. § 271(a) by making, using, selling, importing, and offering
8 for sale within the United States the Accused Products, which infringe the '032 patent.

9 23. Since at least about July 18, 2013, Clean Bottle has had, and continues to
10 have, the specific intent to induce its customers or users of its products to infringe the
11 '032 Patent. For example, simply by selling a mixer ball in conjunction with Clean
12 Bottles, Clean Bottle instructs its customers, or users, on how to perform the methods of
13 the '032 Patent and intends the Accused products to be used in this manner.

14 24. Clean Bottle's customers, or users of the Accused Products, do, in fact,
15 infringe the '032 Patent.

16 25. Since at least about July 18, 2013, Clean Bottle has known, or should have
17 known, that its customers, or users of its products, infringe the '032 Patent.

18 26. The Accused Products are especially made to be used, and are in fact used,
19 by customers, or users, of the Accused Products, in a way that infringes the '032 Patent.

20 27. Clean Bottle has indirectly infringed, and continues to indirectly infringe,
21 the '032 Patent under 35 U.S.C. §§ 271(b) and (c) by actively inducing infringement of,
22 or contributorily infringing the '032 Patent.

23 28. Despite its knowledge of the '032 Patent, Clean Bottle has continued to
24 infringe, and induce others to infringe the '032 Patent.

25 29. The conduct of Clean Bottle as set forth hereinabove gives rise to a cause of
26 action for infringement of the '032 Patent, pursuant to at least 35 U.S.C. §§ 271 and 281.

1 30. Clean Bottle has manufactured, used, sold, imported, and offered for sale
2 Accused Products despite an objectively high likelihood that its actions constitute
3 infringement of the '032 Patent.

4 31. Clean Bottle's acts of infringement have caused damage to Sundesa, and
5 Sundesa is entitled to recover the damages sustained as a result of Clean Bottle's
6 wrongful acts in an amount subject to proof at trial. Clean Bottle's infringement of
7 Sundesa's rights under the '032 Patent will continue to damage Sundesa's business
8 causing irreparable harm for which there is no adequate remedy at law, unless it is
9 enjoined by this Court.

10 32. By reason of the foregoing, Sundesa is entitled to monetary relief against
11 Clean Bottle, pursuant to 35 U.S.C. §§ 283-85, as more fully set forth herein below.

12 **PRAYER FOR RELIEF**

13 Sundesa prays for judgment as follows:

14 A. A judgment finding Clean Bottle liable for infringement of one or more of
15 the claims of the '032 Patent;

16 B. Orders of this Court temporarily, preliminarily, and permanently enjoining Clean
17 Bottle, its agents, servants, and any and all parties acting in concert with any of them, from
18 directly, or indirectly, infringing in any manner any of the claims of the '032 Patent, pursuant to
19 at least 35 U.S.C. § 283;

20 C. An award of damages adequate to compensate Sundesa for Clean Bottle's
21 infringement of the '032 Patent, in an amount to be proven at trial;

22 D. A declaration that this is an exceptional case and that Sundesa be awarded its
23 attorney fees and expenses, pursuant to at least 35 U.S.C. § 285;

24 E. An award of Sundesa's costs in bringing this action, pursuant to all
25 applicable state statutory and common law, including at least 35 U.S.C. § 284.

26 F. An award of Sundesa's attorney fees, pursuant to all applicable state
27 statutory and common law.

28 G. Prejudgment interest, pursuant to at least 35 U.S.C. § 284;

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- H. Post-judgment interest, pursuant to at least 28 U.S.C. § 1961(a); and
- I. For such other and further relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Sundesha demands trial by jury on all claims and issues so triable.

DATED: July 18, 2013

Larry R. Laycock
 David R. Wright
 Tyson K. Hottinger
 Adam B. Beckstrom
MASCHOFF BRENNAN

By: 

 Tyson K. Hottinger

Attorneys for Plaintiff
 SUNDESA, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge James V. Selna and the assigned discovery Magistrate Judge is Jean P. Rosenbluth.

The case number on all documents filed with the Court should read as follows:

SACV13- 1086 JVS (JPRx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
Central District of California

Sundesha, LLC, a Utah Limited Liability Company,

Plaintiff(s)

v.

Clean Designs, LLC, a California Limited Liability
Company

Defendant(s)

SACV13 - 01086 JVS (JPRx)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Tyson K. Hottinger
Larry R. Laycock
David R. Wright
Maschoff Brennan
20 Pacifica, Suite 1130, Irvine, CA 92618
(949) 202-1900

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: _____

JUL 19 2013

CLERK OF COURT

D. Lagman
DODIE LAGMAN

Signature of Clerk



1225

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Sundesa, LLC, a Utah Limited Liability Company	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Clean Designs, LLC, a California Limited Liability Company <div style="text-align: right; font-weight: bold; font-size: 1.2em;">BY FAX</div>
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(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Maschoff Brennan Maschoff Brennan 201 South Main Street, Suite 600 & 20 Pacifica, Suite 1130 Salt Lake City, UT 8111 Irvine, CA 92618 (435) 252-1360 (949) 202-1900	(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
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II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border: none;"> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 1 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 3 </td> <td style="border: none;"> Incorporated or Principal Place of Business in this State Incorporated and Principal Place of Business in Another State Foreign Nation </td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 4 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 6 </td> </tr> </table>	Citizen of This State	PTF DEF	<input type="checkbox"/> 1 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 3	Incorporated or Principal Place of Business in this State Incorporated and Principal Place of Business in Another State Foreign Nation	PTF DEF	<input type="checkbox"/> 4 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 6
Citizen of This State	PTF DEF	<input type="checkbox"/> 1 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 3	Incorporated or Principal Place of Business in this State Incorporated and Principal Place of Business in Another State Foreign Nation	PTF DEF	<input type="checkbox"/> 4 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 6		

IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1. Original Proceeding <input type="checkbox"/> 2. Removed from State Court <input type="checkbox"/> 3. Remanded from Appellate Court <input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify) <input type="checkbox"/> 6. Multi-District Litigation
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V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ Subject to proof at trial

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 35 U.S.C. Section 271 & 35 U.S.C. Section 284; Patent infringement

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> Habeas Corpus: 463 Alien Detainee	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input checked="" type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	TORTS	PERSONAL PROPERTY	<input type="checkbox"/> 535 Death Penalty	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	FORFEITURE/PENALTY	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	LABOR	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 751 Family and Medical Leave Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 790 Other Labor Litigation	
			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	
			<input type="checkbox"/> 448 Education		

FOR OFFICE USE ONLY: Case Number: _____

SACV13 - 01086 JVS (JPRx)

AFTER COMPLETING PAGE 1 OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED ON PAGE 2.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? NO YES

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? NO YES

If yes, list case number(s): Cases have not been assigned case numbers. A separate Notice of Related Cases will be filed once cases are assigned.

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply)
- A. Arise from the same or closely related transactions, happenings, or events; or
 - B. Call for determination of the same or substantially related or similar questions of law and fact; or
 - C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 - D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.

Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.

Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose. **NOTE: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Orange	

*Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT): Tyren Halting DATE: 7/18/13

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))