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14 Attorneys for Plaintiff Sundesa, LLC

15 UNITED STATES DISTRICT COURT

16 CENTRAL DISTRICT OF CALIFORNIA

17 Sundesa, LLC, a Utah Limited Liability
18 Company,

19 Plaintiff,

20 v.

21 TBCPM, L.L.C., an Oklahoma Limited
22 Liability Company d/b/a The Broadway
23 Clinic,

24 Defendant.

25 **SACV13 - 01088 CJC (JPRx)**
26 Civil Action No. _____

27 **COMPLAINT FOR PATENT**
28 **INFRINGEMENT**

[Demand For Jury Trial]

1 Plaintiff Sundesa, LLC (“Sundesa”) complains against defendant TBCPM, L.L.C.,
2 d/b/a The Broadway Clinic (“Broadway Clinic”) for the causes of action alleged as
3 follows:

4 **THE PARTIES**

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

8 2. Sundesa alleges Broadway Clinic is a limited liability company organized
9 and existing under the laws of the State of Oklahoma with its principal place of business
10 located at 1801 North Broadway Avenue, Oklahoma City, Oklahoma 73103.

11 **JURISDICTION AND VENUE**

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

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

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

20 6. Defendant does, and has done, substantial business in this judicial District,
21 including: (i) committing acts of patent infringement in this judicial District and
22 elsewhere in California; (ii) regularly doing business or soliciting business by virtue of
23 Defendant’s nationwide, interactive and commercial website which directs Defendant’s
24 services and products to California; and (iii) 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 Broadway Clinic is
28 consistent 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") and United States Design Patent No. D510,235 (the "'235 Design Patent")
7 (collectively the "Asserted Patents").

8 10. Sundesa is an exclusive licensee of the Asserted Patents and has been
9 granted all rights thereunder, including the right, and standing, to enforce the Asserted
10 Patents.

11 11. Broadway Clinic makes, uses, sells, offers for sale, and imports HealthWise
12 Bottles with a physically independent agitator that allows users to mix a composition of
13 ingredients therein (the "Accused Products"), which can be found on its website,
14 www.broadwayclinic.com.

15 12. By its design, manufacture and, sales of the Accused Products, Broadway
16 Clinic encourages users to mix ingredients using the Accused Products.

17 13. Broadway Clinic markets and encourages its customers to use the Accused
18 Products to mix ingredients together in such a way as to perform the claimed methods of
19 the '032 Patent.

20 14. On July 18, 2013, Sundesa's attorneys sent Broadway Clinic a letter
21 informing Broadway Clinic of its infringement of the Asserted Patents.

22 15. Broadway Clinic has had knowledge of the Asserted Patents since at least
23 about July 18, 2013.

24 16. Since learning of the Asserted Patents, Broadway Clinic has continued to
25 infringe the Asserted Patents.

26 17. Use of any of the Broadway Clinic Accused Products infringes the '032
27 Patent.

28 18. The Accused Products have no substantial non-infringing uses.

1 19. Additionally, the design of the Accused Products are substantially the same
2 as the design that is the subject matter of the '235 Design Patent.

3 20. Furthermore, the design of the Accused Products is so similar to the design
4 that is the subject matter of the '235 Design Patent that it will deceive customers and
5 persuade them to buy the Accused Products thinking they are actually buying products
6 protected by the '235 Design Patent.

7 **FIRST CLAIM FOR RELIEF**
8 **(Infringement of the '032 Patent)**

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

11 22. Broadway Clinic has directly infringed, and continues to directly infringe,
12 the '032 Patent under 35 U.S.C. § 271(a) by making, using, selling, importing, and
13 offering for sale within the United States the Accused Products, which infringe the '032
14 patent.

15 23. Since at least about July 18, 2013, Broadway Clinic has had, and continues
16 to have, the specific intent to induce its customers or users of its products to infringe the
17 '032 Patent. For example, Broadway Clinic instructs its customers, or users of the
18 Accused Products, to use the Accused Products to mix ingredients according to the
19 claimed methods of the '032 Patent.

20 24. Broadway Clinic's customers, or users of the Accused Products, do, in fact,
21 infringe the '032 Patent.

22 25. Since at least about July 18, 2013, Broadway Clinic has known, or should
23 have known, that its customers, or users of its products, infringe the '032 Patent.

24 26. The Accused Products are especially made to be used, and are in fact used,
25 by customers or users, to mix ingredients in a way that infringes the '032 Patent.

26 27. Broadway Clinic has indirectly infringed, and continues to indirectly
27 infringe, the Asserted Patents under 35 U.S.C. §§ 271(b) and (c) by actively inducing
28 infringement of, or contributorily infringing, the '032 Patent.

1 28. Despite its knowledge of the '032 Patent, Broadway Clinic has continued to
2 infringe and induce others to infringe the '032 Patent.

3 29. The conduct of Broadway Clinic as set forth hereinabove gives rise to a
4 cause of action for infringement of the '032 Patent, pursuant to at least 35 U.S.C. §§ 271
5 and 281.

6 30. Broadway Clinic has manufactured, used, sold, imported, and offered for
7 sale Accused Products despite an objectively high likelihood that its actions constitute
8 infringement of the '032 Patent.

9 31. Broadway Clinic's acts of infringement have caused damage to Sundesa, and
10 Sundesa is entitled to recover the damages sustained as a result of Broadway Clinic's
11 wrongful acts in an amount subject to proof at trial. Broadway Clinic's infringement of
12 Sundesa's rights under the '032 Patent will continue to damage Sundesa's business
13 causing irreparable harm for which there is no adequate remedy at law, unless it is
14 enjoined by this Court.

15 32. By reason of the foregoing, Sundesa is entitled to monetary relief against
16 Broadway Clinic, pursuant to 35 U.S.C. §§ 283–85, as more fully set forth herein below.

17 **SECOND CLAIM FOR RELIEF**

18 **(Infringement of the '235 Design Patent)**

19 33. By this reference Sundesa realleges and incorporates the foregoing
20 paragraphs as though fully set forth herein.

21 34. Broadway Clinic has infringed, and continues to infringe, the '235 Design
22 Patent by making, using, offering to sell, selling, or importing, in this District, and
23 elsewhere in the United States, the Accused Product, the design of which is substantially
24 similar to the ornamental design of the '235 Design Patent.

25 35. Broadway Clinic's actions constitute infringement of the '235 Design Patent
26 in violation of 35 U.S.C. § 271.

27 36. Sundesa has sustained damages and will continue to sustain damages as a
28 result of Broadway Clinic's aforementioned acts of infringement.

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

3 H. An award of Sundesa's attorney fees, pursuant to all applicable state
4 statutory and common law.

5 I. Prejudgment interest, pursuant to at least 35 U.S.C. § 284;

6 J. Post-judgment interest, pursuant to at least 28 U.S.C. § 1961(a); and

7 K. For such other and further relief as the Court deems just and equitable.

8 **DEMAND FOR JURY TRIAL**

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

10
11 DATED: July 18, 2013

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

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15 By: _____
16 Tyson K. Hottinger

17 Attorneys for Plaintiff
18 SUNDESA, LLC
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**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 Cormac J. Carney 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- 1088 CJC (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

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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.

TBCPM, L.L.C., an Oklahoma Limited Liability
Company d/b/a The Broadway Clinic,

Defendant(s)

SACV13 - 01088 CJC (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

DODJIE LAGMAN

Signature of Clerk or Deputy Clerk



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 ☐)

Sundesa, LLC, a Utah Limited Liability Company

DEFENDANTS (Check box if you are representing yourself ☐)

TBCPM, L.L.C., an Oklahoma Limited Liability Company, d/b/a The Broadway Clinic

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

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.)

BY FAX

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☐ 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)

- | | | | | | |
|---|--------------------------------|--------------------------------|---|--------------------------------|--------------------------------|
| Citizen of This State | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District Litigation

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		<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument			<input type="checkbox"/> 535 Death Penalty	
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	TORTS	PERSONAL PROPERTY	<input type="checkbox"/> Other:	SOCIAL SECURITY
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<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"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<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"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<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"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<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"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	BANKRUPTCY	FORFEITURE/PENALTY	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<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"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<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"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	LABOR	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 895 Freedom of Info. Act	<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"/> 896 Arbitration	<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"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<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"/> 950 Constitutionality of State Statutes		<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"/> 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:

SACV13-01088-CJC (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): Tyson Hattenger 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))