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**COPY**

1 Jeffrey G. Sheldon (SBN 67516)  
jgsheldon@usip.com  
2 William D. Bowen (SBN 254398)  
william.bowen@usip.com  
3 SHELDON MAK & ANDERSON PC  
100 Corson Street, Third Floor  
4 Pasadena, California 91103-3842  
Telephone: (626) 796-4000  
5 Facsimile: (626) 795-6321

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CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

6 Attorney for Plaintiff Spears  
Manufacturing Co., a California  
7 corporation

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION

11 SPEARS MANUFACTURING CO., a  
California corporation,

Case No: **CV 13-05488-R**

12 Plaintiff,

**COMPLAINT FOR  
INFRINGEMENT OF UNITED  
STATES PATENT NO. 7.857,357;**

13 vs.

14 HYDRO-RAIN, INC., a Utah corporation  
15 and DOES 1 - 10,

**REQUEST FOR JURY TRIAL**

16 Defendants.

17  
18 Plaintiff Spears Manufacturing Co., a California corporation, for its Complaint  
19 against Hydro-Rain, Inc., a California corporation, alleges as follows:

20 **THE PARTIES**

21 1. Plaintiff, Spears Manufacturing Co. ("Spears"), is a corporation  
22 organized under the laws of California, having a place of business in Sylmar,  
23 California, within this judicial district.

24 2. Upon information and belief, Hydro-Rain, Inc., is a limited liability  
25 corporation organized and existing under the laws of the State of Utah, having a  
26 principal place of business at 25 E. Union Ave., North Salt Lake, Utah ("Hydro-  
27 Rain").

28

1           3.     The true names and capacities of the Defendants named herein as DOES  
2 1 through 10, whether individual, corporate, associate, or otherwise, are unknown to  
3 Plaintiff, who therefore sues said Defendants by said fictitious names. Plaintiff is  
4 informed and believes, an thereon alleges, that each of the Defendants designated  
5 herein as DOE is legally responsible for the events and happenings hereinafter  
6 alleged and legally caused injury and damages proximately thereby to Plaintiff as  
7 alledged herein. Plaintiff will seek leave to amend the Complaint when the true  
8 names and capacities of said DOE Defendants have been ascertained. Hydro-Rain,  
9 Inc. and DOES 1 through 10 are hereinafter collectively referred to as "Defendants."

10           4.     Plaintiff is informed and believes, and on that basis alleges, that each of  
11 the Defendants participated in and is in some manner responsible for the acts  
12 described in this Complaint and any damages resulting therefrom.

13           5.     Plaintiff is informed and believes, and on that basis alleges, that each of  
14 Hydro-Rain and DOES 1-10 has acted in concert and participation with each other  
15 concerning the claim in this Complaint.

16           6.     Plaintiff is informed and believes, and on that basis alleges, that each of  
17 Hydro-Rain and DOES 1-10 was empowered to act as the agent, servant and/or  
18 employees of each other, and that all the acts alleged to have been done by each of  
19 them were authorized, approved and/or ratified by each of them.

20   **JURISDICTION AND VENUE**

21           7.     Plaintiff Spears asserts against Defendants a claim for patent  
22 infringement arising under the patent laws of the United States, Title 35 of the United  
23 States Code. This Court, therefore, has subject matter jurisdiction under 28 U.S.C.,  
24 §§ 1331 and 1338(a).

25           8.     Venue is proper in this judicial district under 28 U.S.C. 1391(c) and  
26 1400(a)-(b) because a substantial part of the events giving rise to this claim, as to  
27 each Defendant, occurred within this judicial district. Defendant Hydro-Rain sells  
28 infringing products in this judicial district.

**THE PATENT AT ISSUE**

1  
2 9. Plaintiff Spears Manufacturing Company has been in the business of  
3 manufacturing plastic pipe fittings and valves for over 40 years. Formed from a  
4 small, one-machine shop in 1969, founder Wayne Spears has worked persistently to  
5 improve the quality of valves and fittings available to its customers. Plaintiff's  
6 business has grown since then so that it today maintains over one million square feet  
7 of manufacturing facilities in four states, nine distribution centers across the United  
8 States, and worldwide product distribution.

9 10. Plaintiff's efforts to improve its products over many decades includes  
10 significant expense and effort engineering its valves and fittings so they are  
11 functional, durable, and cost-effective to manufacture and to purchase. Plaintiff's  
12 engineering team has spent numerous hours in 3-D solid modeling of product  
13 characteristics, and finite element analysis of stress and long-term creep of its  
14 products under various pressure and temperature conditions.

15 11. Plaintiff is the owner of all right, title and interest in and to United  
16 States Patent No. 7,857,357 (the "357 Patent") entitled "Reinforced Pipe Fitting  
17 with Eccentric Flow Path," that was duly and legally issued on December 28, 2010.  
18 A true and correct copy of the '357 Patent is attached hereto as Exhibit A.

19 12. The '357 Patent is an innovative solution to problems that plague waste  
20 plumbing systems and cause them to fail, leading to high costs to address failures and  
21 replace the plumbing.

22 13. In many plumbing systems, the crotch of non-metal pipe fittings such as  
23 tees, ells, crosses, wyes, and double wyes are subject to cyclical pressure conditions.  
24 The crotch of these fittings can be a failure point for the piping system if stress from  
25 the pressurized fluid induces the crotch to become round or inverted. When the  
26 piping system fails at the crotch point, the owner of a piping system is required to  
27 pay for expensive, messy, and difficult repairs and replacement of parts of the piping  
28

1 system. Any innovation that helps avoid failure at these crotch points thus helps save  
2 owners considerable time, effort, and repair costs.

3 14. Conventionally, engineers have tried to address failure at the crotch  
4 points by adding material to the outside of the fittings using ribs, tapers, and other  
5 supports. However, this does little to reduce stress within the crotches and may even  
6 make it worse, and adding material to the outside of the fittings increases  
7 manufacturing costs. Others have also tried to address this problem by reducing the  
8 flow path diameter on the inside of the fitting, but this increases the pressure drop  
9 across the fitting and requires adding costly additional material to portions of the  
10 fitting that do not suffer from stress.

11 15. The '357 Patent addresses these problems by adding material to the  
12 most critical areas of the pipe fittings without adding wasteful material to areas that  
13 cannot benefit from additional material. This improves burst and long-term strength  
14 and significantly improves cyclic/fatigue strength. Piping systems that use fittings  
15 manufactured with the innovations claimed in the '357 Patent are thus much less  
16 likely to fail early on, saving purchasers significant repair costs and making the  
17 product much more attractive to customers. Together with the fact that the  
18 innovations of the '357 Patent do not increase manufacturing costs as much as other  
19 solutions that address the problems associated with crotch-point stress, the '357  
20 Patent makes production of pipe fittings much more profitable and provides a major  
21 advantage to manufacturers of the product.

22 **CLAIM FOR PATENT INFRINGEMENT AGAINST ALL DEFENDANTS**

23 16. Upon information and belief, Defendant Hydro-Rain and Does 1-10  
24 have, without authorization, made, imported, used, offered for sale and/or sold pipe  
25 fittings that directly infringe the '357 Patent, both literally and/or under the doctrine  
26 of equivalents (the "Accused Fittings").

27 17. The Accused Fittings are reinforced pipe fittings having a body with a  
28 cylindrical first section and a cylindrical second section, the cylindrical first section

1 having side walls, a first entrance opening and a first longitudinal axis, the  
2 cylindrical second section having side walls, a second entrance opening, and a  
3 second longitudinal axis intersecting at an angle between about  $90^\circ$  and about  $180^\circ$ ,  
4 the side walls of the cylindrical first section and the side walls of the cylindrical  
5 second section intersecting defining an internal crotch point disposed within the  
6 plane defined by the first longitudinal axis and the second longitudinal axis.

7 18. The cross-section of the cylindrical first section in the Accused Fittings,  
8 taken along a plane perpendicular to the first longitudinal axis and passing through  
9 the crotch point, defines a first crotch point open area with a periphery comprising a  
10 major circular portion spanning an arc of at least about  $120^\circ$  and an elliptical, non-  
11 circular portion, the elliptical, non-circular portion of the periphery of the first crotch  
12 point area being disposed most proximate to the crotch point, whereby the distance  
13 of the first crotch point opening, measured along a first line segment running  
14 between a point most proximate to the crotch point, through the first longitudinal  
15 axis, and to a point on the opposite wall of the cylindrical first section is shorter than  
16 the distance of the first crotch point opening measured along a second line segment  
17 disposed perpendicular to the first line segment and running between opposite sides  
18 of the cylindrical first crotch point open area and passing through the first  
19 longitudinal axis.

20 19. The cross-section of the cylindrical second section in the Accused  
21 Fittings, taken along a plane perpendicular to the second longitudinal axis and  
22 passing through the crotch point, defines a pipe stop open area with a periphery  
23 comprising a major circular portion spanning an arc of at least about  $120^\circ$  and an  
24 elliptical, non-circular portion, the elliptical, non-circular portion of the periphery of  
25 the pipe stop area being disposed most proximate to the crotch point, whereby the  
26 distance of the pipe stop opening, measured along a third line segment running  
27 between a point most proximate to the crotch point, through the second longitudinal  
28 axis, and to a point on the opposite wall of the cylindrical second section is shorter



1 than the distance of the pipe stop opening measured along a fourth line segment  
2 disposed perpendicular to the third line segment and running between opposite sides  
3 of the cylindrical pipe stop open area and passing through the second longitudinal  
4 axis.

5 20. As a result of the aforementioned acts, Defendants have infringed  
6 various claims of the '357 Patent, including at least independent claims 1 and 11.

7 21. Upon information and belief, because of the acts of patent infringement  
8 herein complained of, Defendants have made substantial profits to which they are not  
9 equitably entitled.

10 22. Plaintiff is entitled to recover from Defendants all damages it has  
11 sustained as a result of Defendants' infringement of the '357 Patent.

12 23. Upon information and belief, Defendants' infringement of the '357  
13 Patent will continue and will cause Plaintiff irreparable harm unless enjoined by this  
14 Court. Plaintiff has no adequate remedy at law.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff requests judgment as to Defendants as follows:

17 A. Preliminary and permanent injunctions against further infringement of  
18 the '357 Patent by Defendants;

19 B. An award in favor of Plaintiff of the damages it has sustained as a  
20 consequence of Defendants' infringement of the '357 Patent pursuant to 35 U.S.C. §  
21 284;

22 C. An award to Plaintiff of interest and costs as fixed by the Court as to  
23 Defendants; and

24 ////

25 ////

26 ////


27 ////

28

1 D. An award to Plaintiff of such other and further relief as this Court deems  
2 just and proper.

3  
4 DATED: July 29, 2013

Respectfully submitted,  
SHELDON MAK & ANDERSON PC

6  
7 By:   
8 William D. Bowen  
9 Attorneys for Plaintiff Spears Manufacturing  
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**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, and Local Rule 38-1, Plaintiff Spears Manufacturing Co. does hereby demand trial by jury of each and every issue or claim as to which it is entitled to trial by jury under Rule 38(a) of the Federal Rules of Civil Procedure.

DATED: July 29, 2013

Respectfully submitted,  
SHELDON MAK & ANDERSON PC

By:   
\_\_\_\_\_  
William D. Bowen  
Attorneys for Plaintiff, Spears Manufacturing  
Co.



**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 Manuel Real and the assigned discovery Magistrate Judge is Patrick J. Walsh.

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

**CV13- 5488 R (PJWx)**

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.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

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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).*

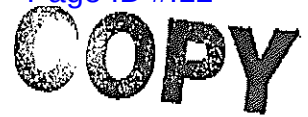
Subsequent documents must be filed at the following location:

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

**Southern Division**  
411 West Fourth St., Rm. 1-063  
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.



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

**I. (a) PLAINTIFFS** ( Check box if you are representing yourself  )  
SPEARS MANUFACTURING CO., a California Corporation.

**DEFENDANTS** ( Check box if you are representing yourself  )  
HYDRO-RAIN, INC., a Utah Corporation

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  
Jeffrey G. Sheldon (SBN 67516) and William D. Bowen (SBN 254398)  
SHELDON MAK & ANDERSON PC  
100 Corson Street, Third Floor  
Pasadena, CA 91103-3842 Tel: 626-976-4000

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

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

1. U.S. Government Plaintiff  
 2. U.S. Government Defendant

3. Federal Question (U.S. Government Not a Party)  
 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 checked="" 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 checked="" 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:** \$

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of causa. Do not cite jurisdictional statutes unless diversity.)  
Patent Infringement under Title 35 of the United States Code

**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	<b>TORTS</b>	<b>TORTS</b>	<input type="checkbox"/> 535 Death Penalty	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> Other: 540 Mandamus/Other	<input type="checkbox"/> 861 HIA (1395(f))
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<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 Influence & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<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"/> 320 Assault, Libel & Slander	<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"/> 330 Fed. Employers' Liability	<b>BANKRUPTCY</b>	<b>FORFEITURE/PENALTY</b>	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 550 Securities/Commodities/Exchange	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<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"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	<b>CIVIL RIGHTS</b>	<b>LABOR</b>	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 891 Agricultural Acts	<b>REAL PROPERTY</b>	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 210 Land	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 751 Family and Medical Leave Act	
<input type="checkbox"/> 899 Adm'n. Procedures Act/Review of Appeal of Agency Decision		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 790 Other Labor Litigation	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	
		<input type="checkbox"/> 441 Education			

CV 13-05488

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

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): \_\_\_\_\_

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
County of Los Angeles	

(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).

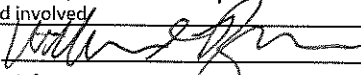
County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	State of Utah, Davis County

(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
County of Los Angeles	

\*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):  DATE: 7/29/13

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))