

1 Michael T. Hornak (State Bar No. 81936)
 email: mhornak@rutan.com
 2 Ronald P. Oines (State Bar No. 145016)
 email: roines@rutan.com
 3 Bradley A. Chapin (State Bar No. 232885)
 email: bchapin@rutan.com
 4 Timothy Spivey (State Bar No. 269084)
 RUTAN & TUCKER, LLP
 5 611 Anton Boulevard, Fourteenth Floor
 Costa Mesa, California 92626-1931
 6 Telephone: 714-641-5100
 Facsimile: 714-546-9035

7 Attorneys for Plaintiffs HID GLOBAL
 8 CORPORATION, ASSA ABLOY AB and
 DESTRON FEARING CORPORATION
 9

10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12

13 HID GLOBAL CORPORATION, a
 Delaware corporation; ASSA ABLOY
 14 AB, a Swedish Limited Liability
 Company; and DESTRON FEARING
 15 CORPORATION, a Delaware
 corporation,
 16

17 Plaintiffs,

18 vs.

19 APPLIED WIRELESS
 IDENTIFICATIONS GROUP, INC., a
 Delaware corporation; and DOES 1
 20 through 10, inclusive,
 21

22 Defendants.
 23
 24
 25
 26
 27
 28

FILED
 2013 AUG 20 PM 2:41
 CLERK U.S. DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 SANTA ANA

Case No. **SACV 13 - 01272 JVS (JCGx)**

**COMPLAINT FOR INJUNCTION
 AND DAMAGES FOR PATENT
 INFRINGEMENT**

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT
 INFRINGEMENT

COPY

1 Plaintiffs HID GLOBAL CORPORATION (“HID”), ASSA ABLOY AB
2 (“AAAB”) and DESTRON FEARING CORPORATION (“Destron”) (collectively,
3 “Plaintiffs”), for their Complaint against defendants APPLIED WIRELESS
4 IDENTIFICATIONS GROUP, INC. (“AWID”), and DOES 1 through 10, inclusive
5 (collectively, “Defendants”), allege as follows:

6 **JURISDICTION AND VENUE**

7 1. This is an action involving claims of patent infringement under Title
8 35, United States Code. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331
9 and 1338(a).

10 2. Venue is proper with this Court pursuant to 28 U.S.C. § 1391(b) and
11 (c), as Defendants reside in this judicial district, a substantial part of the events,
12 omissions and acts which are the subject matter of this action occurred within the
13 Central District of California, and a substantial part of the property that is the
14 subject of the action is located in the Central District of California.

15 **THE PARTIES**

16 3. HID is a Delaware corporation having its principal place of business
17 located at 15370 Barranca Parkway, Irvine, California.

18 4. AAAB is a Limited Liability Company established under the laws of
19 Sweden and having a principal place of business in Stockholm, Sweden. AAAB is
20 HID’s parent company.

21 5. Destron is a Delaware corporation having its principal place of business
22 located in St. Paul, Minnesota.

23 6. Plaintiffs are informed and believe, and thereon allege, that AWID is a
24 Delaware corporation having its principal place of business located at 18300 Sutter
25 Boulevard, Morgan Hill, California 95037.

26 7. The true names and capacities, whether individual, corporate, associate
27 or otherwise, of defendants DOES 1 through 10, inclusive, are unknown to
28 Plaintiffs, which therefore sue said defendants by such fictitious names. Plaintiffs

1 will seek leave of this Court to amend this Complaint to include their proper names
2 and capacities when they have been ascertained. Plaintiffs are informed and believe,
3 and based thereon allege, that each of the fictitiously named defendants participated
4 in and is in some manner responsible for the acts described in this Complaint and
5 the damage resulting therefrom.

6 8. Plaintiffs allege on information and belief that each of the defendants
7 named herein as Does 1 through 10, inclusive, performed, participated in, or abetted
8 in some manner, the acts alleged herein, proximately caused the damages alleged
9 hereinbelow, and are liable to Plaintiffs for the damages and relief sought herein.

10 9. Plaintiffs allege on information and belief that, in performing the acts
11 and omissions alleged herein, and at all times relevant hereto, each of the
12 Defendants was the agent and employee of each of the other Defendants and was at
13 all times acting within the course and scope of such agency and employment with
14 the knowledge and approval of each of the other Defendants.

15 **HID'S BUSINESS**

16 10. HID is a leader in the delivery of secure identity solutions for millions
17 of customers throughout the world. HID's identity solutions are used in a variety of
18 applications, including physical access control, logical access control, access card
19 printing and personalization, highly secure government identification and animal
20 identification. HID's products, solutions and services are sold through a well-
21 established network of OEMs, developers, systems integrators and distributors
22 worldwide. End users of HID's products, solutions and services include businesses
23 and organizations in virtually all industry sectors, including government, healthcare,
24 retail, industrial, commercial, airports, ports, finance and education.

25 11. HID's physical access control products and solutions are sold under
26 HID's well-known brands, including iCLASS®, SmartID®, HID® Prox and
27 Indala® Prox. These industry leading products, include radio frequency
28 identification ("RFID") readers and credentials that operate at low frequency

1 (i.e., 125 kHz), high frequency (i.e., 13.56 MHz), or both.

2 **THE PATENTS AT ISSUE**

3 12. HID owns or is a licensee to numerous patents and other intellectual
4 property that relate to various aspects of HID's business. The patents that are the
5 subject of this action, United States patent nos. 7,439,862 (the "'862 Patent") and
6 5,952,935 (the "'935 Patent"), relate generally to multi-technology readers and
7 credentials.

8 13. The '862 Patent, entitled "Antenna Array For an RFID Reader
9 Compatible With Transponders Operating At Different Carrier Frequencies," issued
10 on October 21, 2008. AAAB owns by assignment, and HID is a licensee of, the
11 '862 Patent.

12 14. The '862 Patent generally discloses, among other things, an RFID
13 reader that includes at least two reader antennas that operate at different carrier
14 frequencies. The reader antennas are arranged in a configuration that optimizes
15 performance of the RFID system, while maintaining a compact size.

16 15. The '935 Patent, entitled "Reprogrammable Channel Search Reader,"
17 issued on September 14, 1999. Destron owns the '935 Patent. Pursuant to a license
18 agreement dated September 21, 2007 (the "License Agreement"), Destron's
19 predecessor granted to Assa Abloy Identification Technology Group AB
20 ("AAITG") an exclusive license in certain fields to the '935 Patent. Destron's
21 predecessor further granted to AAITG the right to enforce the '935 Patent to the full
22 extent of the license granted, including the right to file actions for patent
23 infringement for any current or past infringement. By assignment, AAAB owns the
24 rights granted to AAITG pursuant to the license from Destron's predecessor.
25 Pursuant to the License Agreement, Destron's predecessor, as owner of the '935
26 Patent, agreed to participate in any infringement action brought by AAITG, or its
27 successor to the rights under the License Agreement, AAAB. Destron is named as a
28 plaintiff in this action for that reason alone.

1 16. The '935 Patent generally discloses an RFID reader that is capable of
2 reading identification signals from transponders that use different frequencies,
3 different methods of modulation, and/or different methods of encoding to
4 communicate with the RFID reader. Another key aspect of the '935 Patent provides
5 that the RFID reader is programmable.

6 **AWID'S INFRINGEMENT**

7 17. AWID also is in the business of providing physical access control
8 solutions, including RFID readers that operate at 125 kHz and 13.56 MHz carrier
9 frequencies. AWID competes directly with HID, and sells and seeks to sell its RFID
10 readers to various industry sectors, including those to which HID sells its products.
11 As set forth below, certain of AWID's readers incorporate inventions that are
12 disclosed in and protected by the '862 and '935 patents.

13 **FIRST CLAIM FOR RELIEF**

14 **(Patent Infringement – '862 Patent)**

15 18. Plaintiffs reallege each and every allegation set forth in paragraphs 1
16 through 17, inclusive, and incorporate them herein by this reference.

17 19. Defendants make, use, sell, offer for sale, and/or import into the United
18 States products that meet each and every element of one or more claims of the '862
19 patent. As such, Defendants have infringed and are infringing the '862 patent.

20 20. Plaintiffs have marked relevant products and/or product literature with
21 the '862 Patent pursuant to 35 U.S.C. § 287. On information and belief, Defendants
22 have had actual knowledge of the '862 Patent before and during their infringement
23 of the '862 Patent. On information and belief, Defendants' infringement of the
24 '862 patent has been and will continue to be willful, wanton and deliberate with full
25 knowledge and awareness of Plaintiffs' patent rights.

26 21. Plaintiffs have been damaged in an amount to be determined at trial,
27 but which is no less than a reasonable royalty, and irreparably injured by
28 Defendants' infringing activities. Plaintiffs will continue to be so damaged and

1 irreparably injured unless such infringing activities are enjoined by this Court.

2 22. Moreover, in light of the willful nature of Defendants' conduct, this
3 case should be deemed "exceptional" under the Patent Laws. As a result, in addition
4 to damages, Plaintiffs are entitled to enhanced damages and their attorneys' fees and
5 costs incurred herein.

6 **SECOND CLAIM FOR RELIEF**

7 **(Patent Infringement – '935 Patent)**

8 23. Plaintiffs reallege each and every allegation set forth in paragraphs 1
9 through 17, inclusive, and incorporate them herein by this reference.

10 24. Defendants make, use, sell, offer for sale, and/or import into the United
11 States products that meet each and every element of one or more claims of the '935
12 Patent. As such, Defendants have infringed and are infringing the '935 Patent.

13 25. Plaintiffs have marked relevant products and/or product literature with
14 the '935 Patent pursuant to 35 U.S.C. § 287. On information and belief, Defendants
15 have had actual knowledge of the '935 Patent before and during their infringement
16 of the '935 Patent. On information and belief, Defendants' infringement of the
17 '935 patent has been and will continue to be willful, wanton and deliberate with full
18 knowledge and awareness of Plaintiffs' patent rights.

19 26. Plaintiffs have been damaged in an amount to be determined at trial,
20 but which is no less than a reasonable royalty, and irreparably injured by
21 Defendants' infringing activities. Plaintiffs will continue to be so damaged and
22 irreparably injured unless such infringing activities are enjoined by this Court.

23 27. Moreover, in light of the willful nature of Defendants' conduct, this
24 case should be deemed "exceptional" under the Patent Laws. As a result, in addition
25 to damages, Plaintiffs are entitled to enhanced damages and their attorneys' fees and
26 costs incurred herein.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

COMPLAINT FOR PATENT
INFRINGEMENT

1 1. That Defendants, their officers, directors, agents, servants, employees,
2 and all persons and entities in active concert or participation with them, or any of
3 them, be preliminarily and permanently enjoined and restrained from further
4 infringement of the '862 Patent and the '935 Patent;

5 2. A judgment by the Court that Defendants have infringed and are
6 infringing the '862 Patent and the '935 Patent;

7 3. An award of damages for infringement of the '862 Patent and the '935
8 Patent, together with prejudgment interest and costs, said damages to be trebled by
9 reason of the intentional and willful nature of Defendants' infringement, as provided
10 by 35 U.S.C. § 284;

11 4. A determination that this case is "exceptional" under 35 U.S.C. § 285,
12 and an award of Plaintiffs' reasonable attorneys' fees;


13 5. That any monetary award include pre- and post-judgment interest at the
14 highest rate allowed by law;

15 6. For costs of suit; and

16 7. For such other and further relief as the Court may deem just and proper.

17 Dated: August 19, 2013

RUTAN & TUCKER, LLP
MICHAEL T. HORNAK
RONALD P. OINES
BRADLEY A. CHAPIN
TIMOTHY SPIVEY

18
19
20 By: 
21 Ronald P. Oines
22 Attorneys for Plaintiffs HID GLOBAL
23 CORPORATION, ASSA ABLOY
24 AB, and DESTRON FEARING
25 CORPORATION
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DEMAND FOR JURY TRIAL

Pursuant to Local Rule 38-1 of the Local Rules of the United States District Court for the Central District of California, Plaintiffs hereby demand a jury trial in this action.

Dated: August 19, 2013

RUTAN & TUCKER, LLP
MICHAEL T. HORNAK
RONALD P. OINES
BRADLEY A. CHAPIN
TIMOTHY SPIVEY

By: 

Ronald P. Oines
Attorneys for Plaintiffs HID GLOBAL CORPORATION, ASSA ABLOY AB and DESTRON FEARING CORPORATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge James V. Selna and the assigned Magistrate Judge is Jay C. Gandhi.

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

SACV 13-01272 JVS (JCGx)

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.

Clerk, U. S. District Court

August 20, 2013

Date

By D. Vo

Deputy Clerk

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 Street, G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

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

I. (a) **PLAINTIFFS** (Check box if you are representing yourself)
 HID GLOBAL CORPORATION, a Delaware corporation;
 and ASSA ABLOY AB, a Swedish Limited Liability
 Company, and DESTRON FEARING CORPORATION, a
 Delaware corporation

DEFENDANTS (Check box if you are representing yourself)
 APPLIED WIRELESS IDENTIFICATIONS GROUP, INC., a
 Delaware corporation; and DOES 1 through 10, inclusive,

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

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

Michael T. Hornak SBN 81936 / Ronald P. Oines SBN 145016
 Bradley A. Chapin SBN 232885/ Timothy Spivey SBN 269084
 RUTAN & TUCKER, LLP, 611 Anton Boulevard, 14th Floor
 Costa Mesa, CA 92626
 Telephone: (714) 641-5100

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)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <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:** \$ According to proof.

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.)
 This action involves claims of patent infringement under Title 35, 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 | Habeas Corpus: | <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"/> 463 Alien Detainee | <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"/> 510 Motions to Vacate Sentence | <input type="checkbox"/> 840 Trademark |
| <input type="checkbox"/> 430 Banks and Banking | <input type="checkbox"/> 140 Negotiable Instrument | TORTS | PERSONAL PROPERTY | <input type="checkbox"/> 530 General | SOCIAL SECURITY |
| <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. | <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment | PERSONAL INJURY | <input type="checkbox"/> 370 Other Fraud | <input type="checkbox"/> 535 Death Penalty | <input type="checkbox"/> 861 HIA (1395ff) |
| <input type="checkbox"/> 460 Deportation | <input type="checkbox"/> 151 Medicare Act | <input type="checkbox"/> 310 Airplane | <input type="checkbox"/> 371 Truth in Lending | Other: | <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"/> 315 Airplane Product Liability | <input type="checkbox"/> 380 Other Personal Property Damage | <input type="checkbox"/> 540 Mandamus/Other | <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"/> 550 Civil Rights | <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 | BANKRUPTCY | <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement | <input type="checkbox"/> 865 RSI (405 (g)) |
| <input type="checkbox"/> 850 Securities/Commodities/Exchange | <input type="checkbox"/> 190 Other Contract | <input type="checkbox"/> 340 Marine | <input type="checkbox"/> 422 Appeal 28 USC 158 | FORFEITURE/PENALTY | FEDERAL TAX SUITS |
| <input type="checkbox"/> 890 Other Statutory Actions | <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"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) |
| <input type="checkbox"/> 891 Agricultural Acts | <input type="checkbox"/> 196 Franchise | <input type="checkbox"/> 350 Motor Vehicle | CIVIL RIGHTS | <input type="checkbox"/> 690 Other | <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 |
| <input type="checkbox"/> 893 Environmental Matters | REAL PROPERTY | <input type="checkbox"/> 355 Motor Vehicle Product Liability | <input type="checkbox"/> 440 Other Civil Rights | LABOR | |
| <input type="checkbox"/> 895 Freedom of Info. Act | <input type="checkbox"/> 210 Land Condemnation | <input type="checkbox"/> 360 Other Personal Injury | <input type="checkbox"/> 441 Voting | <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"/> 442 Employment | <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"/> 443 Housing/Accommodations | <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"/> 445 American with Disabilities-Employment | <input type="checkbox"/> 751 Family and Medical Leave Act | |
| | | <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability | <input type="checkbox"/> 446 American with Disabilities-Other | <input type="checkbox"/> 790 Other Labor Litigation | |
| | | | <input type="checkbox"/> 448 Education | <input type="checkbox"/> 791 Employee Ret. Inc. Security Act | |

FOR OFFICE USE ONLY: Case Number: **SACV 13 - 01272 JVS (JCGx)**

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

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): 8:10-CV-01954-JVS-RNB

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 |
| HID Global Corporation: Orange County | Assa Abloy AB: Sweden Destron Fearing Corporation: Minnesota |

(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 |
| Applied Wireless Identifications Group, Inc.: County of Orange (28 U.S.C. Section 1391(c)(2)) | |

(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 County | |

*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: August 19, 2013

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)) |