

1 Joseph K. Li (Bar No. 216227)
jliu@one llp.com
2 Peter R. Afraziabi (Bar No. 193336)
pafraziabi@onellp.com
3 Nate L. Dilger (Bar No. 196203)
ndilger@onellp.com
4 William O'Brien (Bar No. 99526)
wobrien@onellp.com

5 ONE LLP
6 4000 MacArthur Boulevard
7 West Tower, Suite 1100
8 Newport Beach, CA 92660
9 Telephone: (949) 502-2870
10 Facsimile: (949) 258-5081

11 Attorney for Plaintiff Network Signatures, Inc.

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14 SOUTHERN DIVISION

FILED
2011 MAR 14 PM 4:22
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

15 Network Signatures, Inc.,

16 Plaintiff,

17 v.

18 PNC Financial Services Group, Inc., a
19 Pennsylvania Corporation

20 Defendant.

Case No. SACV11-00414 JST (RNBx)

COMPLAINT FOR PATENT
INFRINGEMENT, PERMANENT
INJUNCTION AND DAMAGES

DEMAND FOR JURY TRIAL

21 For its Complaint against Defendant PNC Financial Services Group, Inc.
22 (“Defendant”), Plaintiff Network Signatures, Inc. (“Network Signatures”) alleges as
23 follows:

24 THE NAVAL RESEARCH LABORATORY

25 1. The Naval Research Laboratory (“NRL”) is one of the most accomplished
26 research-and-development organizations in the country. NRL scientists have not only
27 made remarkable breakthroughs in military technology, they have literally changed the
28 world for all of us. Without their efforts, we would not have GPS, modern radar, and any
number of other technological innovations that we now take for granted. This lawsuit
concerns another such innovation: technology that allows for the safe and secure

1 communication of sensitive information via the Internet, such as personal, banking,
2 commercial, financial, and other information.

3 2. Federal law empowers the government to license its patents to private parties
4 for commercialization as well as for enforcement of the patent without the United States as
5 a party. 37 C.F.R. § 404.5(b)(2). By doing so, the government can use market forces to
6 better capitalize on its technologies the way a private party would. In addition, a license
7 agreement can give the private licensee the proper incentives to protect the government's
8 intellectual property from theft, a task often handled better by a private entity.

9 **THE PARTIES**

10 3. Plaintiff Network Signatures, Inc. ("Network Signatures") is a corporation
11 duly organized and existing under the laws of California with its principal place of business
12 30021 Tomas Street, Suite 300, Rancho Santa Margarita, California 92688. As alleged
13 below, the United States of America has granted to Network Signatures an exclusive
14 license concerning the patented technology at issue in this lawsuit.

15 4. Defendant is a corporation duly organized and existing under the laws of the
16 State of Pennsylvania, with its principal place of business at PNC Financial Services
17 Group, Inc., 249 Fifth Avenue, One PNC Plaza Pittsburgh, PA 15222. Defendant is in the
18 business of providing financial products and services to persons in the U.S. and worldwide
19 through physical and electronic channels, including the Internet.

20 **JURISDICTION AND VENUE**

21 5. This is a civil action for patent infringement arising under the Patent Act of
22 the United States, 35 U.S.C. §§ 1 et seq. This court has subject matter jurisdiction of such
23 federal question claims pursuant to 28 U.S.C. §§ 1331 and 1338(a).

24 6. Venue is proper under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b) in that the
25 acts and transactions complained of herein were conceived, carried out, made effective, and
26 had effect within the State of California and within this district, among other places.
27 Defendant resides in this judicial district by virtue of its business activities in this district,
28

1 have committed acts of infringement in this judicial district, or have committed acts of
2 contributory infringement and inducement of infringement within this judicial district.

3 **NETWORK SIGNATURES LICENSES THE NAVY'S TECHNOLOGY**

4 7. On April 23, 1996, the United States Patent & Trademark Office duly and
5 legally issued United States Letters Patent No. 5,511,122 ("the '122 Patent"), entitled
6 "Intermediate Network Authentication."

7 8. The '122 patent claims, among other things, a critical method of
8 authenticating a computer in which a private electronic key is used, together with a
9 validating public electronic key, to create a cryptographic signature, the cryptographic
10 signature is transmitted in at least one packet to the validating computer, and the signature
11 is verified by the validating computer using its private key and the public key of the
12 computer to be authenticated. This authentication method allows for the safe and secure
13 communication of sensitive information, such as personal, banking, commercial, financial,
14 and other information, as is transmitted between computers by Defendant and its customers
15 and users herein.

16 9. The '122 Patent is owned by the United States of America, as represented by
17 the Secretary of the Navy. To allow enforcement, commercialization of and protection of
18 this patent and the technology it represents, in September 2004, the United States Navy
19 executed an exclusive license agreement with Metrix Services, Inc. ("Exclusive License
20 Agreement") and, by this Exclusive License Agreement, expressly granted Metrix Services
21 the exclusive right to practice, enforce, and sublicense, among other rights, the '122 Patent,
22 subject to the general limitations imposed by federal law. A true and correct copy of the
23 Exclusive License Agreement is attached hereto as Exhibit A and incorporated herein by
24 reference. With the express approval of the United States Navy, Metrix Services
25 transferred its entire right, title, and interest to, and in, the '122 Patent to Network
26 Signatures on February 14, 2006. A true and correct copy of the First Amendment to the
27 Exclusive License Agreement, which, among other things, approved the assignment of the
28 Exclusive License Agreement to Network Signatures, is attached hereto as Exhibit B and

1 incorporated herein by reference. A true and correct copy of the Assignment from Metrix
2 to Network Signatures is attached as Exhibit C and incorporated herein by reference.

3 10. Pursuant to its rights under the Exclusive License Agreement, Network
4 Signatures has begun the commercial development of a product, known as EasyConnect,
5 that utilizes the '122 Patent. Network Signatures has demonstrated the product to NRL
6 personnel and has received NRL's recognition of its development efforts. A true and
7 correct copy of an October 12, 2006, letter from the Navy to Network Signatures reflects
8 this and is attached as Exhibit D and incorporated by reference herein.

9 11. Network Signatures has also begun exercising its other primary obligation
10 under the Exclusive License Agreement: protecting the Navy's intellectual property rights
11 from infringement.

12 **FIRST CLAIM FOR RELIEF**

13 **AGAINST DEFENDANT FOR DIRECT, CONTRIBUTORY AND INDUCING**
14 **INFRINGEMENT OF U.S. PATENT NO. 5,511,122**

15 12. Plaintiff incorporates herein by reference the allegations set forth in
16 paragraphs 1-11 of the Complaint as though fully set forth herein.

17 13. A true and correct copy of the '122 Patent is attached as Exhibit E and
18 incorporated herein by reference. On information and belief, Defendant uses digital
19 certificates and digital signatures implemented though the use of public key infrastructure
20 to facilitate communication with its employees and customers. For example, Defendant
21 enables a computer of a Defendant customer, affiliate, business partner, or employee
22 ("sending computer") to send a secure communication over the Internet to another
23 computer ("receiving computer") by using a confidential private key, and a public key, to
24 digitally sign the message being sent. When the receiving computer receives the signed
25 message, it uses the sending computer's public key, and its private key, to decrypt the
26 signature (collectively referred to as "Defendant Authentication Activities").
27
28

1 14. By making, using, selling, and offering for sale Defendant Authentication
2 Activities, Defendant has directly infringed and continues to directly infringe the ‘122
3 Patent, including infringement under 35 U.S.C. § 271(a) and (f).

4 15. On information and belief, Defendant has also indirectly infringed and
5 continues to indirectly infringe the ‘122 Patent by actively inducing direct infringement by
6 other persons—specifically, customers and partners of Defendant—who operate methods
7 that embody or otherwise practice one or more of the claims of the ‘122 Patent when
8 Defendant had knowledge of the ‘122 Patent and knew or should have known that their
9 actions would induce direct infringement by others and intended that their actions would
10 induce direct infringement by others.

11 16. On information and belief, Defendant has also indirectly infringed and
12 continues to indirectly infringe the ‘122 Patent by contributory infringement by providing
13 non-staple articles of commerce to others for use in an infringing system or method with
14 knowledge of the ‘122 Patent and knowledge that these non-staple articles of commerce are
15 used as a material part of the claimed invention of the ‘122 Patent.

16 17. On information and belief, Defendant’s foregoing acts of infringement
17 include infringement by use and implementation of the Defendant Authentication Activities
18 which are made part of their financial products and services.

19 18. On information and belief, Defendant will continue to infringe the ‘122 Patent
20 unless enjoined by this Court.

21 19. As a direct and proximate result of Defendant’s infringement of the ‘122
22 Patent, Network Signatures and the United States Government have been and continue to
23 be damaged in an amount yet to be determined.

24 20. Unless a preliminary and permanent injunction are issued enjoining
25 Defendant and its officers, agents, servants and employees, and all others acting on their
26 behalf or in concert with Defendant, from infringing the ‘122 Patent, Network Signatures,
27 and the United States Government, will be greatly and irreparably harmed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Network Signatures prays for judgment against Defendant as follows:

(1) For a judicial determination and declaration that Defendant has directly infringed, and continues to directly infringe, United States Letters Patent No. 5,511,122;

(2) For a judicial determination and declaration that Defendant has induced, and continues to induce, the infringement of United States Letters Patent No. 5,511,122;

(3) For a judicial determination and declaration that Defendant has contributorily infringed, and continues to contributorily infringe, United States Letters Patent No. 5,511,122;

(4) For a judicial determination and decree that Defendant, its respective subsidiaries, officers, agents, servants, employees, licensees, and all other persons or entities acting or attempting to act in active concert or participation with it or acting on its behalf, be preliminarily and permanently enjoined from further infringement of the '122 Patent;

(5) For a declaration that Defendant notify all of its customers and users of the infringing system and customers' participation in the infringement with Defendant's encouragement, and that Defendant encourage customers to cease all such infringing actions;

(6) For a judicial decree that orders Defendant to account for and pay to Network Signatures all damages caused to Network Signatures by reason of Defendant's infringement pursuant to 35 U.S.C. Section 284, including enhanced damages under 35 U.S.C. Section 285;

(7) For an award of damages according to proof at trial;

(8) For a judicial declaration that this case is exceptional under 35 U.S.C. Section 285 and Defendant be ordered to pay Network Signatures' costs, expenses, and reasonable attorney's fees pursuant to 35 U.S.C. Sections 284 and 285;

1 (9) For a judicial order awarding to Network Signatures pre-judgment and post-
2 judgment interest on the damages caused to it by Defendant's infringement; and

3 (11) For any such other and further relief as the Court may deem just and proper
4 under the circumstances.

5
6 Dated: March 14, 2011

ONE LLP

7
8 By: 

9 Joseph K. Liu

10 Attorney for Plaintiff, Network Signatures, Inc.

DEMAND FOR JURY TRIAL

Plaintiff Network Signatures, Inc. hereby demands trial by jury in this action.

Dated: March 14, 2011

ONE LLP

By: 

Joseph K. Liu

Attorney for Plaintiff, Network Signatures, Inc.

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

**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 Josephine Tucker and the assigned discovery Magistrate Judge is Robert N. Block.

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

SACV11- 414 JST (RNBx)

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.

Name & Address:
Joseph K. Liu, Esq. (jliu@onellp.com)
ONE LLP
4000 MacArthur Blvd., West Tower, Ste. 1100
Newport Beach, CA 92660
Tel: 949-502-2870

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Network Signatures, Inc.

CASE NUMBER

SACV11-00414 JST (RNBx)

PLAINTIFF(S)

v.

PNC Financial Services Group, Inc.,
a Pennsylvania Corporation

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S): _____

A lawsuit has been filed against you.

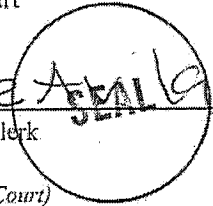
Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Joseph K. Liu of ONE LLP, whose address is 4000 MacArthur Boulevard, West Tower, Suite 1100, Newport Beach, CA 92660. If you fail to do so, 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.

Clerk, U.S. District Court

Dated: March 14, 2011

By: A. DeA...
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

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

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> Network Signatures, Inc.	DEFENDANTS PNC Financial Services Group, Inc., a Pennsylvania Corporation
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Joseph K. Liu (jliu@onellp.com) ONE LLP 4000 MacArthur Blvd., West Tower, Suite 1100, Newport Beach, CA 92660	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <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 <input type="checkbox"/> 1 <input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="border: none; text-align: center;">PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2 <input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5 <input type="checkbox"/> 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3 <input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;"><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	Incorporated or Principal Place of Business in this State	PTF DEF <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
Citizen of This State	PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF <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
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ To be determined.

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.)

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

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
---	---	--	---	---	---

SACVII-00414 JST (RNBx)

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**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): (SEE ATTACHMENT A)

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
Orange County	

(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
	Pennsylvania

(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 PRO PER):  Date March 15, 2011

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. (g))

ATTACHMENT A

8:08-cv-00776-JVS-RNB
2:09-cv-03767-JVS-RNB
2:09-cv-03764-JVS-RNB
2:09-cv-03760-JVS-RNB
8:09-cv-00206-JVS-RNB
8:08-cv-00776-JVS-RNB
8:08-cv-00779-JVS-RNB
8:08-cv-00775-JVS-RNB
8:09-cv-00197-JVS-RNB
8:08-cv-00778-JVS-RNB
8:08-cv-00779-JVS-RNB
8:08-cv-00775-JVS-RNB
8:08-cv-00777-JVS-MLG
8:09-cv-00375-JVS-RNB
8:09-cv-00206-JVS-RNB
8:09-cv-00197-JVS-RNB
8:09-cv-01028-JVS-RNB
8:09-cv-01029-JVS-RNB
8:09-cv-00376-JVS-RNB
8:09-cv-01334-JVS-RNB
8:09-cv-01333-JVS-RNB
8:10-cv-00667-JVS-RNB
2:10-cv-04612-JVS-RNB
2:10-cv-04613-JVS -RNB
2:10-cv-04610-JVS -RNB
8:10-cv-01210-JVS- RNB
8:10-cv-01211-JVS -RNB
8:10-cv-01209-JVS - RNB
8:10-cv-01639-CJC -JEM
8:10-cv-01640-CJC -MAN
8:08-cv-00718-DOC-RNB
8:08-cv-00718-DOC-RNB
8:09-cv-00196-AG-RNB
8:09-cv-01026-AG-RNB
8:10-cv-00666-AG-MLG
2:08-cv-06429-SJO-AJW
8:09-cv-00374-GW-PJW
2:10-cv-10-8171-CAS-FMOx
2:10-cv-10-8178-GHK-PJWx
2:10-cv-10-8172 PA-RZx
2:10-cv-10-8173-PSG-FMOx