

FILED

2011 DEC -7 PM 3:29
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
RIVERSIDE

1 Anthony de Alcuaz (CSB 65599)
2 Email: adealcuaz@mwe.com
3 McDERMOTT WILL & EMERY LLP
4 275 Middlefield Road, Ste. 100
5 Menlo Park, CA 94025-4004
6 Telephone: (650) 815-7555
7 Facsimile: (650) 469-1487

8 Harris A. Wolin (*Pro Hac Vice Pending*)
9 Email: harris.wolin@myerswolin.com
10 MYERS WOLIN, LLC
11 100 Headquarters Plaza
12 North Tower, 6th Floor
13 Morristown, New Jersey 07960-6834
14 Telephone: (973) 401-7159
15 Facsimile: (212) 659-0424

16 Attorneys for Plaintiffs
17 SHOEI CO., LTD.

18 IN THE UNITED STATES DISTRICT COURT
19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 SHOEI CO., LTD.,
21 Plaintiff,
22 v.
23 TROY LEE DESIGNS,
24 Defendants.

ED CV 11-01934 VAP
Case No. (DTBx)

COMPLAINT FOR PATENT
INFRINGEMENT
DEMAND FOR JURY TRIAL

25 **COMPLAINT FOR PATENT INFRINGEMENT**

26 Plaintiff Shoei Co., Ltd. ("Shoei"), brings this action for patent infringement against
27 defendant Troy Lee Designs ("TLD"), and alleges as follows:

28 **THE PARTIES**

1. Plaintiff Shoei Co., Ltd. is organized under the laws of Japan and maintains
its principal place of business at 5-8-5, Ueno, Taito-Ku, Tokyo, Japan. Shoei is a leading
provider of specially-designed premium helmets for motorcycle and sports-related activities
around the world, including in the State of California.

COMPLAINT AND DEMAND FOR JURY
TRIAL

McDERMOTT WILL & EMERY LLP
ATTORNEYS AT LAW
MENLO PARK

1 2. Defendant Troy Lee Designs is a corporation organized under the laws of
2 California and maintains its principal place of business at 155 E. Rincon Street, Corona,
3 California 92879, within this district.

4 **JURISDICTION AND VENUE**

5 3. This is an action for patent infringement under the patent laws of the
6 United States, 35 U.S.C. § 1, *et seq.*

7 4. This court has subject matter jurisdiction over this action pursuant to 28
8 U.S.C. §§1331 and 1338(a).

9 5. This court has personal jurisdiction over TLD by virtue of its business
10 activities in this jurisdiction and its acts of patent infringement committed in this jurisdiction.

11 6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§1391(b)-(c)
12 and 1400(b).

13 **THE PATENT-IN-SUIT**

14 7. On December 21, 2010, the United States Patent and Trademark Office
15 (“PTO”) duly and legally issued United States Patent No. 7,854,023 B2 (“the ’023 patent”),
16 entitled “Helmet and Method of Removing the Same,” to Shoeni as the assignee of the named
17 inventor. Shoeni is the owner of all right, title and interest in the ’023 Patent. A true and correct
18 copy of the ’023 patent is attached as Exhibit A to this Complaint.

19 **INFRINGEMENT BY DEFENDANT**

20 8. Defendant TLD has been and is currently infringing the ’023 patent in
21 violation of 35 U.S.C. §271 by, among other things, designing, making, importing, using, selling,
22 and offering for sale motorcycle helmets in the United States that infringe one or more of the
23 claims of the ’023 Patent. Such infringing products include, by way of example and not
24 limitation, the TLD SE3 Helmets, such as the McQueen, Zap, Zap Gold, Beast, Pistonbone,
25 Team, and Speedwing.
26
27
28

McDERMOTT WILL & EMERY LLP
ATTORNEYS AT LAW
MENLO PARK

FIRST CAUSE OF ACTION

(Infringement of U.S. Patent No. 7,854,023)

9. Shoei realleges and incorporates by reference paragraphs 1-8, inclusive, as though fully set forth in this paragraph.

10. By designing, making, importing, using, selling, and offering for sale helmets in the United States that infringe one or more of the claims of the '023 Patent, without authorization or license by Shoei, TLD has been and is currently infringing the '023 Patent in violation of 35 U.S.C. §271.

11. As a direct result of TLD's infringing activities, Shoei has sustained damages and suffered irreparable harm as a consequence of defendant's infringement, and will continue to sustain damages and irreparable harm unless defendant is enjoined from infringing the '023 Patent.

12. Upon information and belief, TLD had knowledge of and willfully, deliberately, and intentionally infringed the claims of the '023 Patent, rendering this an exceptional case pursuant to 35 U.S.C. §285, and entitling Shoei to enhanced damages and attorneys' fees.

PRAYER FOR RELIEF

WHEREFORE, Shoei seeks judgment in its favor and against TLD, as follows:

- a. Adjudging and decreeing that defendant has infringed the '023 Patent;
- b. Permanently enjoining defendant, its officers, agents, servants, employees, and attorneys, and all persons in active concert or participation with it from infringing the '023 Patent;
- c. Damages as allowed by law to compensate Shoei for TLD's infringement, together with prejudgment interest and costs of suit;
- d. Adjudging defendant a willful infringer and awarding plaintiff treble damages under 35 U.S.C. §284;
- e. Declaring that this is an exceptional case under 35 U.S.C. §285, and awarding reasonable attorneys' fees and expenses to Shoei;

1 f. For such other and further relief as the Court may deem just and
2 appropriate.

3 **JURY DEMAND**

4 Shoei requests a jury trial on all issues triable by jury.

5
6 Dated: December 7, 2011

7 By: 

8 Anthony de Alcuaz (CSB 65599)
9 Email: adealcuaz@mwe.com
10 McDERMOTT WILL & EMERY LLP
11 275 Middlefield Road, Ste. 100
12 Menlo Park, CA 94025-4004
13 Telephone: (650) 815-7555
14 Facsimile: (650) 469-1487

15 Harris A. Wolin (*Pro Hac Vice Pending*)
16 Email: harris.wolin@myerswolin.com
17 MYERS WOLIN, LLC
18 100 Headquarters Plaza
19 North Tower, 6th Floor
20 Morristown, New Jersey 07960-6834
21 Telephone: (973) 401-7159
22 Facsimile: (212) 659-0424

23 Attorneys for Plaintiffs
24 SHOEI CO., LTD.

25
26
27
28 DM_US 30781645-2.090106.0011

**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 Virginia A. Phillips and the assigned discovery Magistrate Judge is David T. Bristow.

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

EDCV11- 1934 VAP (DTBx)

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:

- | | | |
|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012 | <input type="checkbox"/> Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516 | <input checked="" type="checkbox"/> 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.

ORIGINAL

Anthony de Alcuaz (CSB 65599)
Email: adealcuaz@mwe.com
McDERMOTT WILL & EMERY LLP
275 Middlefield Rd., Ste. 100
Menlo Park, CA 94025-4004
Telephone: (650) 815-7555
Facsimile: (650) 469-1487

Attorneys for Plaintiff
SHOEI CO., LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHOEI CO., LTD.

CASE NUMBER

PLAINTIFF(S)

ED CV11-01934 VAP
(DTBx)

v.

TROY LEE DESIGNS,

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, Anthony de Alcuaz, whose address is 275 Middlefield Rd., Ste. 100, Menlo Park, CA 94025-4004. 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.

TERRY NAFISI

Clerk, U.S. District Court

Dated: DEC - 7 2011

By:

M. Mead

Deputy Clerk



[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"/>) SHOEI CO., LTD.	DEFENDANTS TROY LEE DESIGNS
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Anthony de Alcuaz (CSB 65599) McDERMOTT WILL & EMERY LLP 275 Middlefield Rd., Ste. 100, Menlo Park, CA 94025 (650) 815-7555 SEE ATTACHMENT	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: \$** _____

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, et seq., defendant is infringing on Patent No. 7,854,023 B2

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/CC 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 Overpayment 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"/> 22 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"/> 61 HIA(1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 D/WC/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
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FOR OFFICE USE ONLY: Case Number: ED CV11-01934 VAP(DTBx)

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): _____

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
	JAPAN

(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
RIVERSIDE	

(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
RIVERSIDE	

* 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): Anthony de Alcuaz Date December 7, 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))

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

ATTACHMENT TO CIVIL COVER SHEET

(b) Attachment continued for Plaintiffs' attorneys::

Harris A. Wolin (*Pro Hac Vice Pending*)

Email: harris.wolin@myerswolins.com

MYERS WOLIN, LLC

100 Headquarters Plaza

North Tower, 6th Floor

Morristown, New Jersey 07960-6834

Telephone: (973) 401-7159

Facsimile: (212) 659-0424