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Attorneys for Plaintiff, Mavrix Photographs LLC

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

2013 APR - 1 PM 2:26

FILED

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MAVRIX PHOTOGRAPHS LLC, a
California limited liability company,

Plaintiff,
v.

LIVE JOURNAL, INC.; and DOES 1-10,
inclusive,

Defendants.

Case No.: **SACV13-00517 DOC (JPRx)**

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

By Fax

1 Mavrix Photographs LLC complains against Live Journal, Inc. a California
2 corporation, and DOES 1-10 (collectively, Defendants) as follows:

3 **JURISDICTION AND VENUE**

4 1. This is a civil action against Defendants for copyright infringement under the
5 Copyright Act, 17 U.S.C. §§ 101 *et seq.* This Court has subject matter jurisdiction under
6 28 U.S.C. § 1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a) and (b).

7 2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28
8 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be
9 found and transact business in this Judicial District, and the injury suffered by Plaintiff took
10 place in this Judicial District. Defendants are subject to the general and specific personal
11 jurisdiction of this Court because of their contacts with the State of California.

12 **PARTIES**

13 3. Plaintiff Mavrix Photographs LLC (Mavrix) is a California limited liability
14 company incorporated and existing under the laws of California, with its principal place of
15 business located in Orange County, California.

16 4. Defendant Live Journal, Inc. (Live Journal) is incorporated under the laws of
17 California, with its principle place of business in San Francisco, California.

18 5. The true names or capacities, whether individual, corporate or otherwise, of
19 the Defendants named herein as DOES 1 through 10, inclusive, are unknown to Plaintiff,
20 who therefore sues said Defendants by such fictitious names. Plaintiff will ask leave of
21 Court to amend this Complaint and insert the true names and capacities of said Defendants
22 when the same have been ascertained.

23 **FACTS COMMON TO ALL COUNTS**

24 6. Mavrix owns by way of assignment the copyrights to certain photos owned by
25 Mavrix Photo, Inc. (MPI) a prominent celebrity photography agency that licenses its
26 photographs to its end customers: the world's leading newspapers, television programs and
27 magazines, like the Daily Mail of London, People, or US Weekly.

1 7. Live Journal owns and operates the website [www.ohnotheydidnt.Live](http://www.ohnotheydidnt.LiveJournal.com)
2 [Journal.com](http://www.ohnotheydidnt.LiveJournal.com) (the Website). The Website is also known as “oh no they didn’t” or “ONTD”
3 for short, riffing of course on the behavior of celebrities and interest in celebrity culture.

4 8. The Website and Live Journal make money based upon an ad revenue
5 business model. The Website is one of the largest Websites in the world in terms of traffic.
6 According to the recognized internet rankings organization, CubeStat, the Website receives
7 9.8 million page views per day with almost \$30,000 a day in ad revenue generated from the
8 page views and ranking 102 out of the many millions of websites in existence. Defendant
9 has driven massive traffic to its website in part due to the presence of the sought after and
10 searched-for celebrity images, the copyrights to which are owned by third parties (not
11 Defendant or, to Defendants’ knowledge and awareness, Defendants’ users who upload the
12 images and other content). All of this traffic translates to significant advertising revenue.
13 As such, content websites may effectively monetize the content on their websites by
14 securing eyeballs on the sites which translates to ad revenue. Consequently, the
15 Defendants are able to, and do have, in effect a national online photo library located at the
16 [www.ohnotheydidnt.Live Journal.com](http://www.ohnotheydidnt.LiveJournal.com) website, which generates massive revenue for
17 Defendant all by the posting of content, none of which on information and belief is owned
18 or licensed by Defendant.

19 9. Despite having no permission, consent, or license to do so, Live Journal has
20 (a) reproduced, publicly distributed and publicly displayed, (b) made available for
21 download, copy, reproduction, and display, and (c) provided a service and the means,
22 encouragement, and facilitation of and for the upload, download, display, and reproduction
23 of certain original celebrity photographs of Mavrix including the following:

24 a. Nine photographs of pop superstar Katy Perry in the Bahamas. True
25 and correct copies of the Photos and their infringement by Defendants are attached as
26 Exhibit 1.
27
28

1 b. Seven photographs of pop superstar Katy Perry in a colorful rooftop
2 photo shoot. True and correct copies of the Photos and their infringement by Defendants
3 are attached as Exhibit 2.

4 c. Four photographs of pregnant pop superstar Beyonce. True and correct
5 copies of the Photos and their infringement by Defendants are attached as Exhibit 3.

6 d. Collectively, the 20 photographs referenced in paragraphs a-c above are
7 referred to as "Photos."

8 10. MPI filed for copyright registration of all the above Photos within 90 days of
9 their authorship and first publication. The copyright registration certificates are attached
10 hereto as Exhibit 4.

11 **FIRST CLAIM FOR RELIEF**

12 **(Copyright Infringement, 17 U.S.C. § 501 Against all Defendants)**

13 11. Plaintiff Mavrix incorporates here by reference the allegations in paragraphs 1
14 through 10 above.

15 12. Mavrix is the owner of all rights, title, and interest in the copyrights to the
16 Photos, which substantially consist of material wholly original and which are copyright
17 subject matter under the laws of the United States.

18 13. The Photos were timely registered with the United States Copyright Office.

19 14. Defendants have directly, vicariously, contributorily and/or by inducement
20 infringed Mavrix's copyrights by reproducing, displaying, distributing, and utilizing the
21 Photos for purposes of trade violation of 17 U.S.C. § 501 *et seq.*

22 15. All of the Defendant's acts are and were performed without permission,
23 license, or consent of Mavrix.

24 16. Mavrix has identified at least 20 instances of infringement on the Website by
25 way of unlawful reproduction and display of the Photos (as well as the unlawful facilitation
26 of other's reproduction of the Photos). If other infringements are discovered in this case,
27 then they will be identified in discovery and the pleadings will thus conform to the
28 evidence adduced at trial.

17. As a result of the acts of Defendants alleged herein, Mavrix has suffered damage.

18. Defendants have willfully infringed, and unless enjoined, will continue to infringe Mavrix's copyrights by knowingly reproducing, displaying, distributing, and utilizing the Photos by, among other things, virtue of Defendants' employees' creation of the Website and establishment and continual moderation and management of the Website's rules that expressly request, encourage and foster infringement by, among other things, specifically asking people to upload third party copyrighted celebrity-based content and third-party copyrighted celebrity photographs from content owners' websites and other sources around the internet.

19. The wrongful acts of Defendants have caused, and are causing, injury to Mavrix, which damage cannot be accurately computed, and unless this Court restrains Defendants from further commission of said acts, Mavrix will suffer irreparable injury, for all of which it is without an adequate remedy at law. Accordingly, Mavrix seeks a declaration that Defendants are infringing Mavrix's copyrights and an order under 17 U.S.C. § 502 enjoining Defendants from any further infringement.

20. In light of the willful nature of the copyright infringement, Mavrix is also entitled to an award of statutory damages and its attorney's fees.

PRAAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

1. The Defendants, and their officers, agents, servants, employees, and representatives, and all persons in active concert or participation with them, be permanently enjoined from copying, reproducing, displaying, promoting, advertising, distributing, or selling, or any other form of dealing or transaction in, any and all Photos of Mavrix.

2. An accounting be made for all profits, income, receipts or other benefit derived by Defendants from the unlawful reproduction, copying, display, promotion, distribution, or sale of products and services, or other media, either now known or hereafter

1 devised, that improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17
2 U.S.C. §§ 504 (a)(1) & (b).

3 3. Actual damages for copyright infringement pursuant to 17 U.S.C. §§ 504
4 (a)(1) & (b).

5 4. Statutory damages for copyright infringement, including willful infringement,
6 in accordance with 17 U.S.C. §§ 504(a)(2) & (c) and for costs, interest and reasonable
7 attorney's fees pursuant to 17 U.S.C. § 505.

8 5. That Plaintiff be awarded any such other and further relief as the Court may
9 deem just and appropriate.

10 Dated: April 1, 2013

ONE LLP

11
12
13 Bv: 

Peter R. Afrasiabi
Attorneys for Plaintiff,
Mavrix Photographs LLC

DEMAND FOR JURY TRIAL

Plaintiff Mavrix hereby demands trial by jury of all issues so triable under the law.

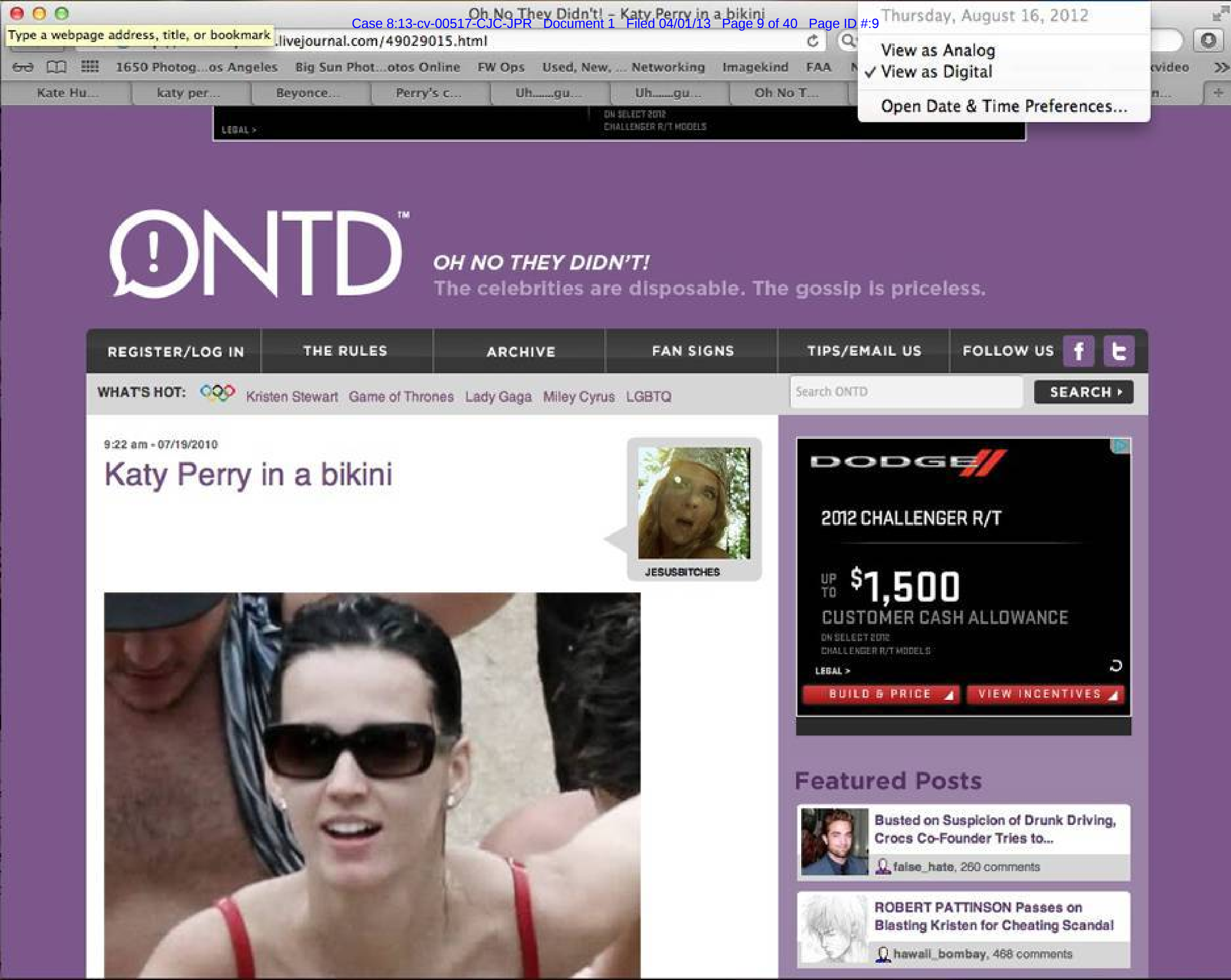
Dated: April 1, 2013

ONE LLP

Bv: 

Peter R. Afrasiabi
Attorneys for Plaintiff,
Mavrix Photographs LLC

EXHIBIT 1



Type a webpage address, title, or bookmark

livejournal.com/49029015.html

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The celebrities are disposable. The gossip is priceless.

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WHAT'S HOT: Kristen Stewart Game of Thrones Lady Gaga Miley Cyrus LGBTQ

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9:22 am - 07/19/2010

Katy Perry in a bikini

JESUSBITCHES



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running around the water park with her pals in a gray and red bikini with bow details.

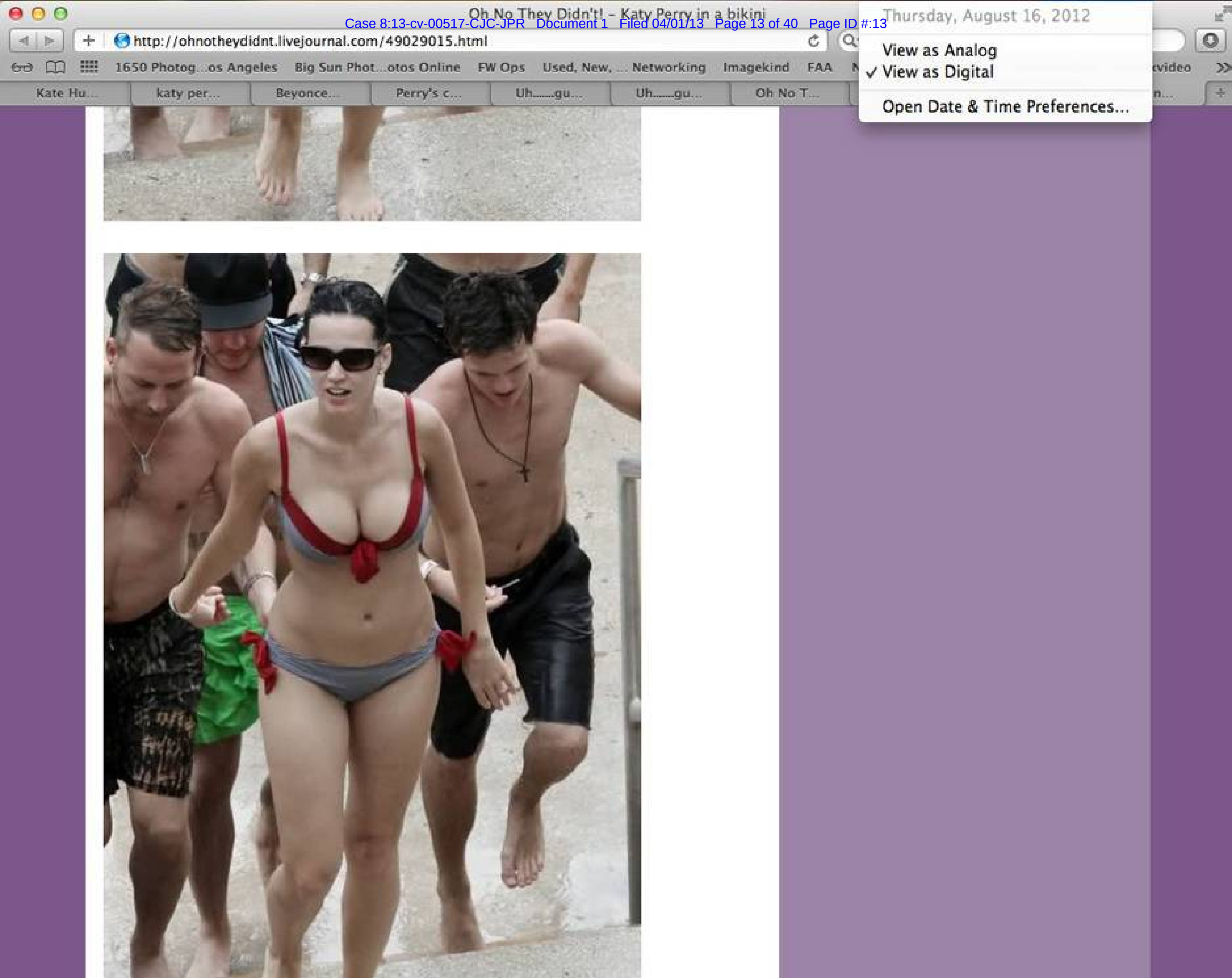
After romping around with her pals, the singer went inter-tubing on a water ride. Sure looks like fun, Katy!

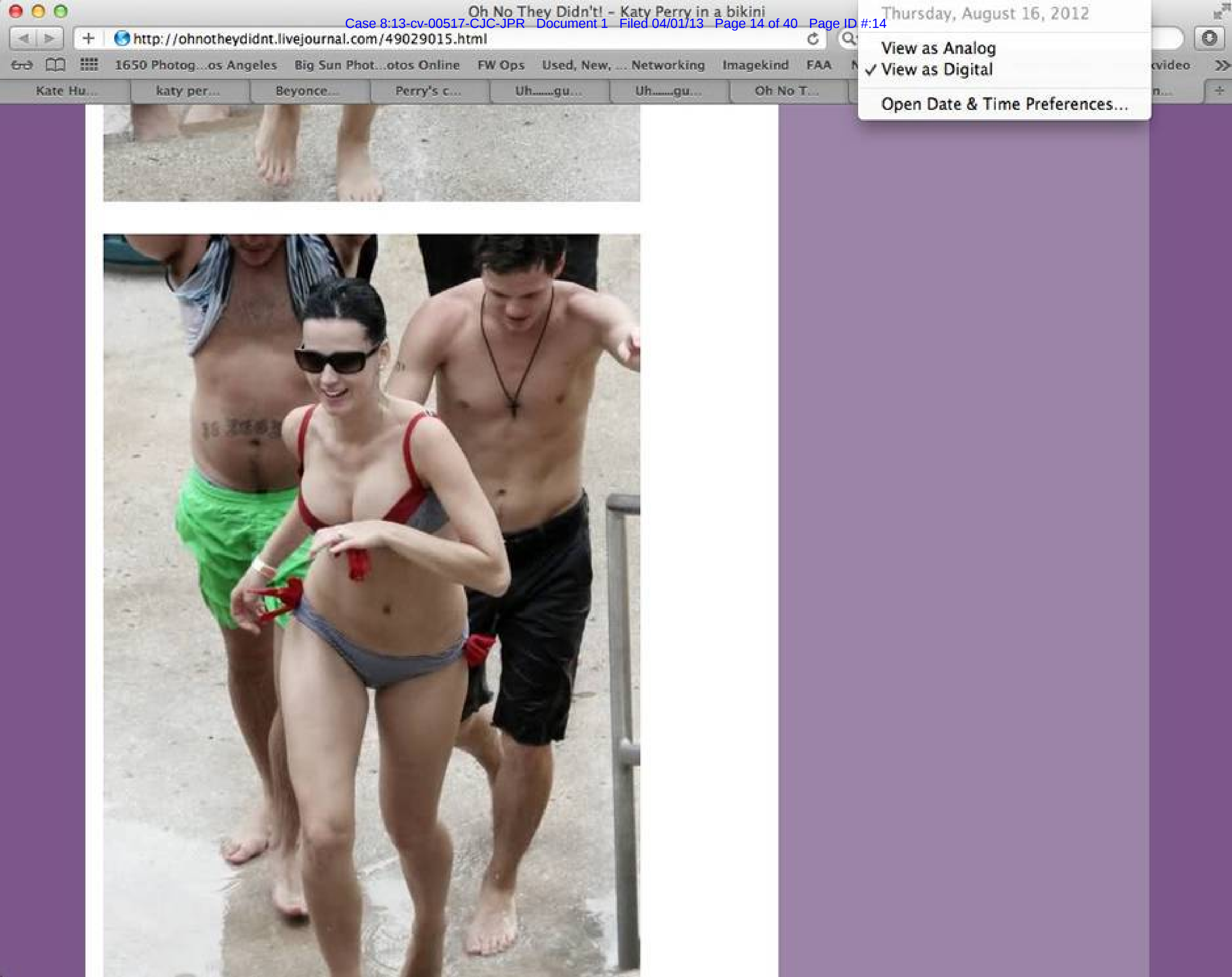


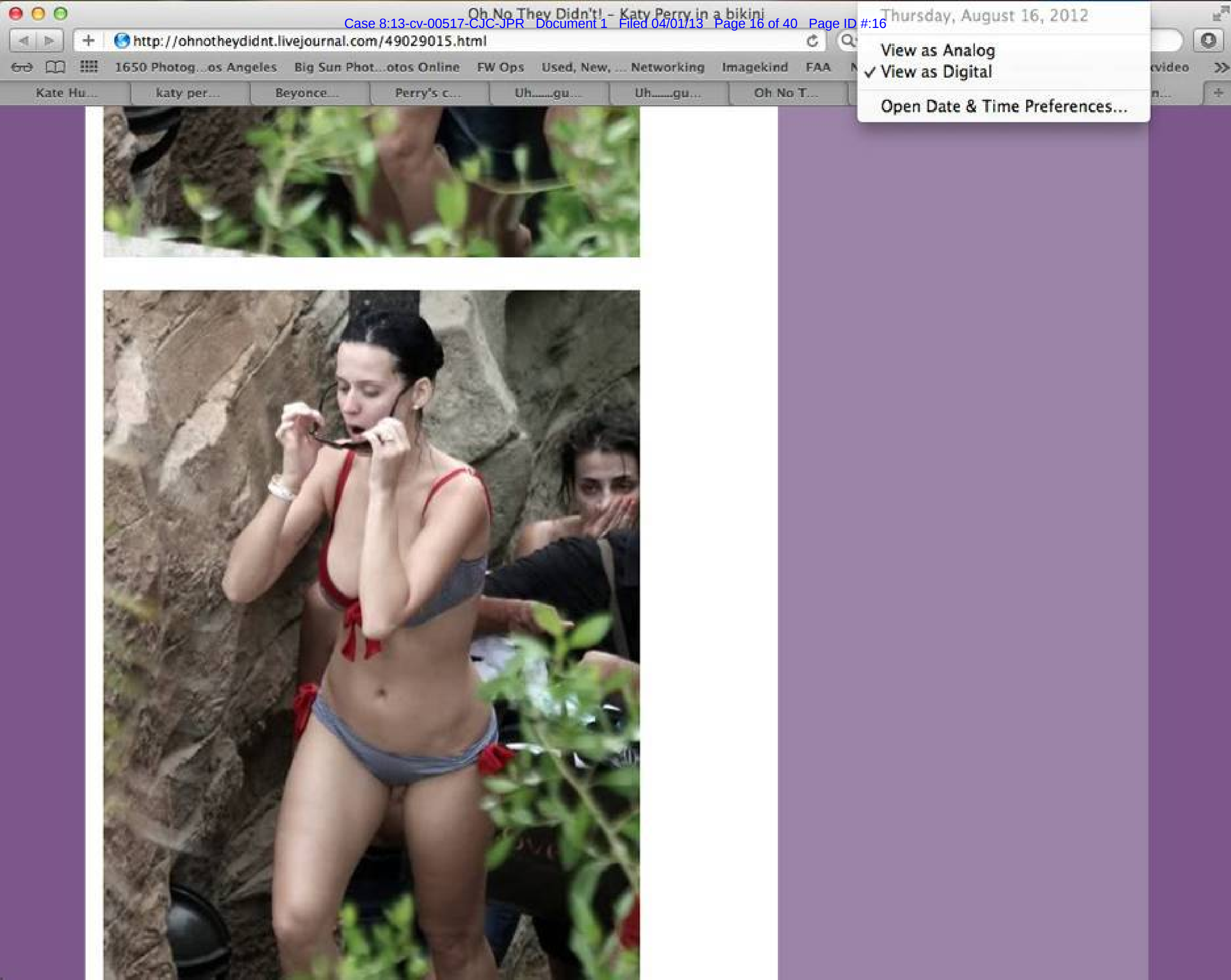
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10:31 am - 06/04/2011

Katy Perry's colorful rooftop photoshoot (june 3)



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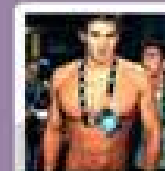
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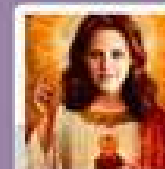
Ex Disneyland Employee Sues Disney Over Religious Discrimination

 _scarlett_icons, 383 comments




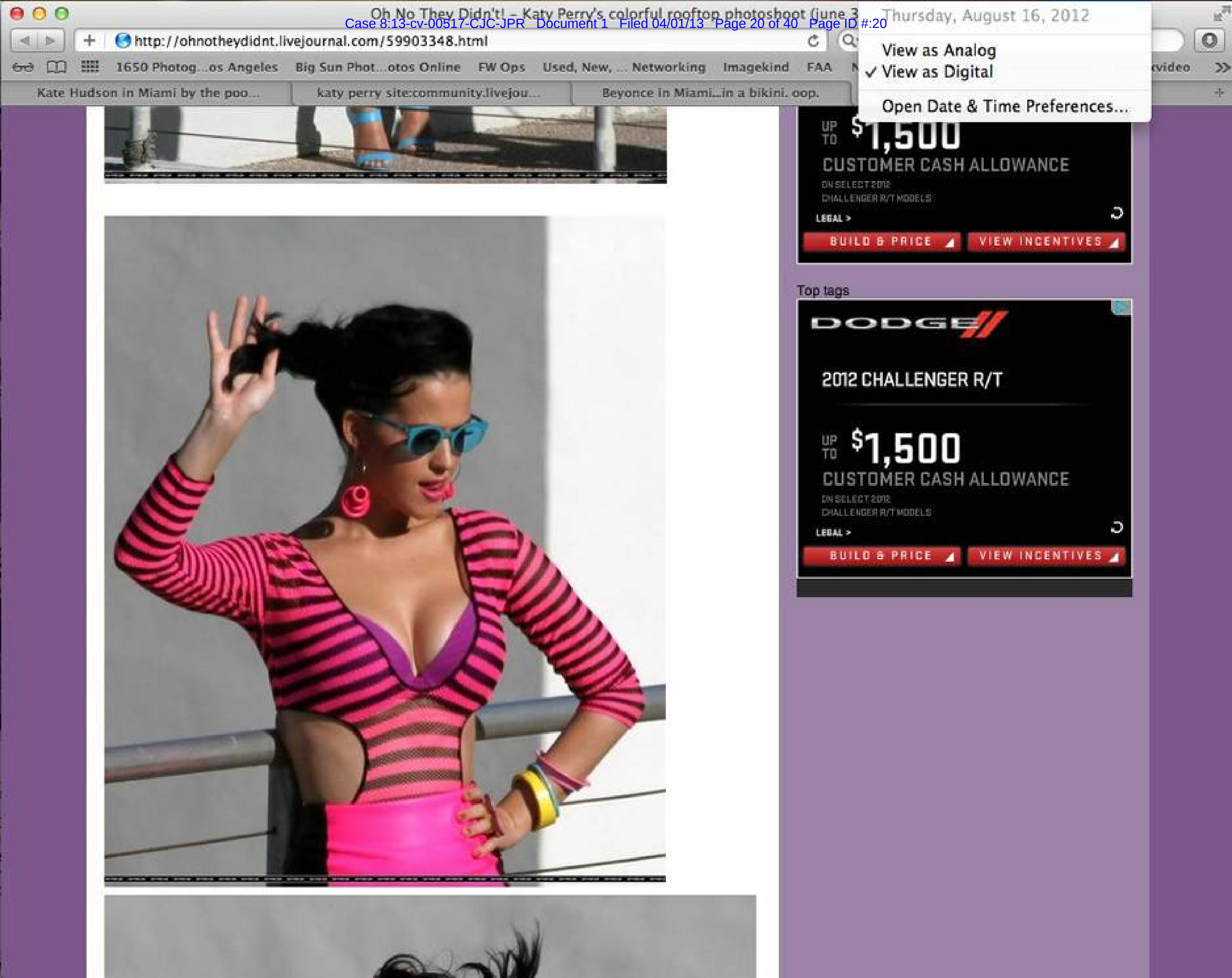
THIS IS A NATHAN ADRIAN POST

 aglows, 391 comments



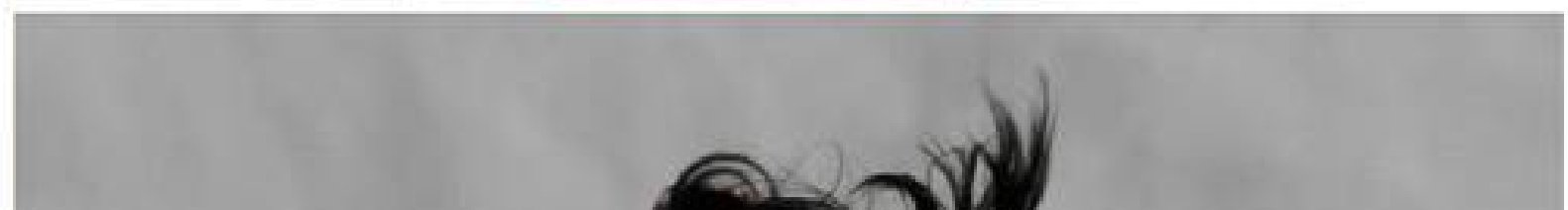
Jodie Foster has shared poignant words.

 galyuhalead, 529 comments



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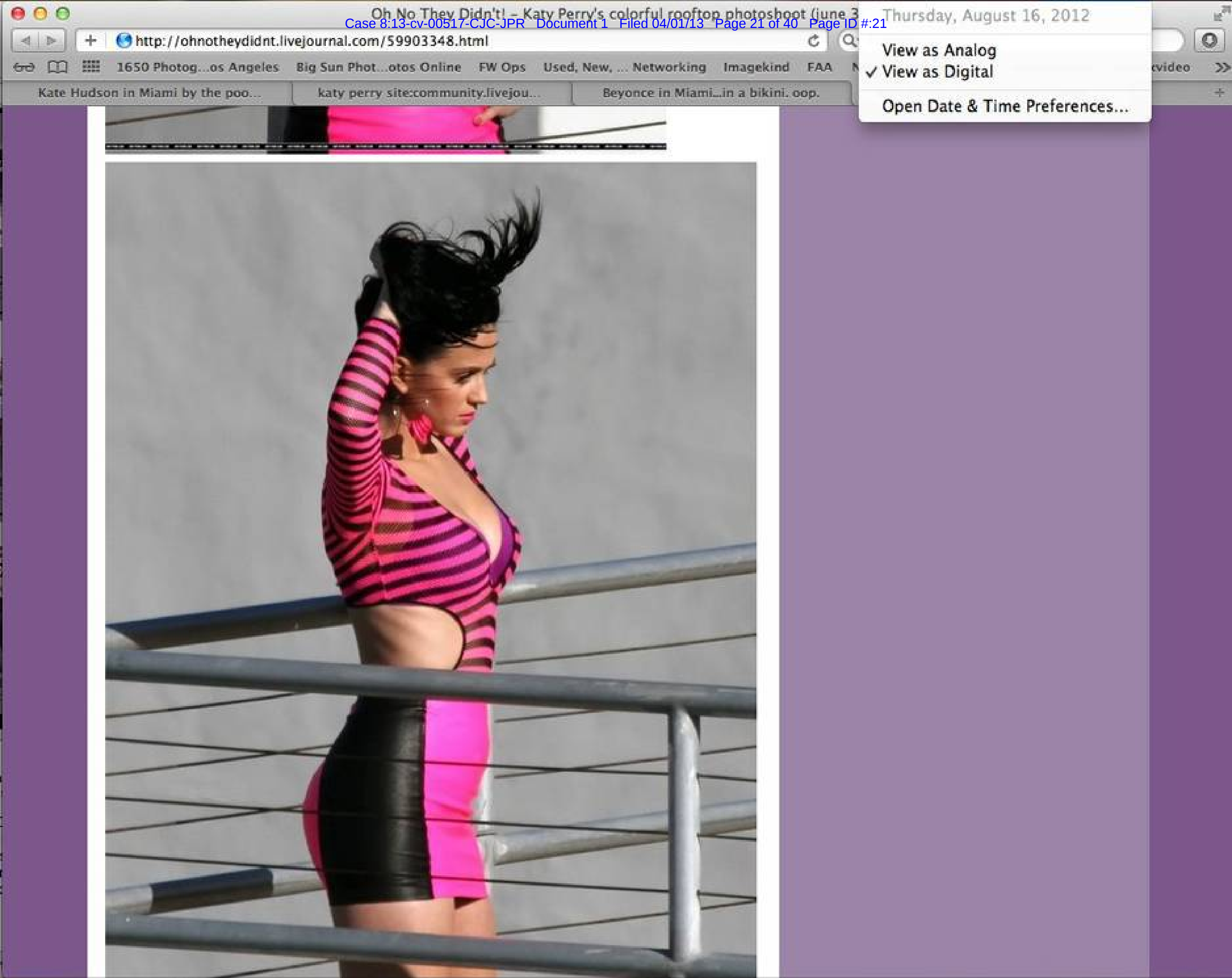
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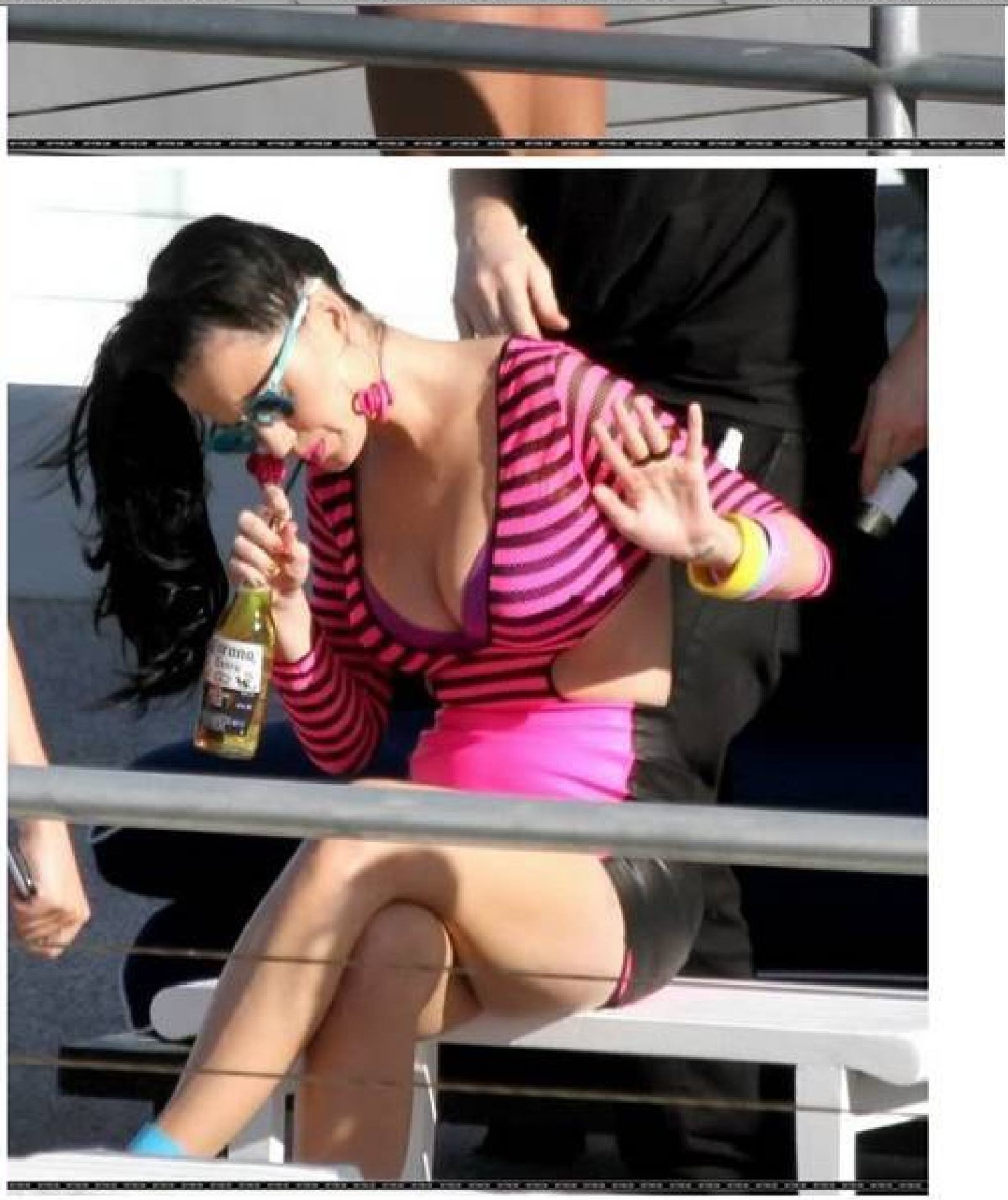
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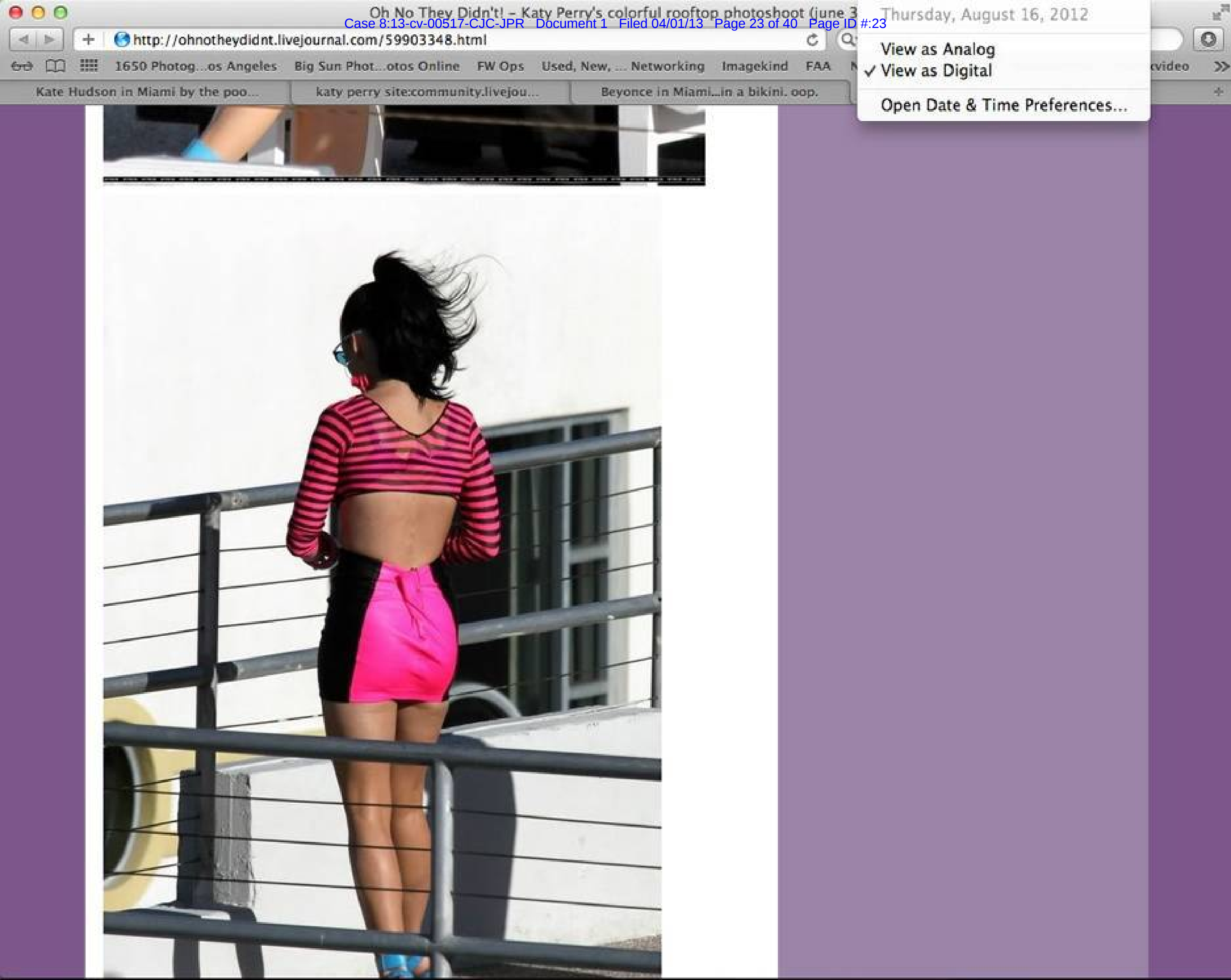
2012 CHALLENGER R/T

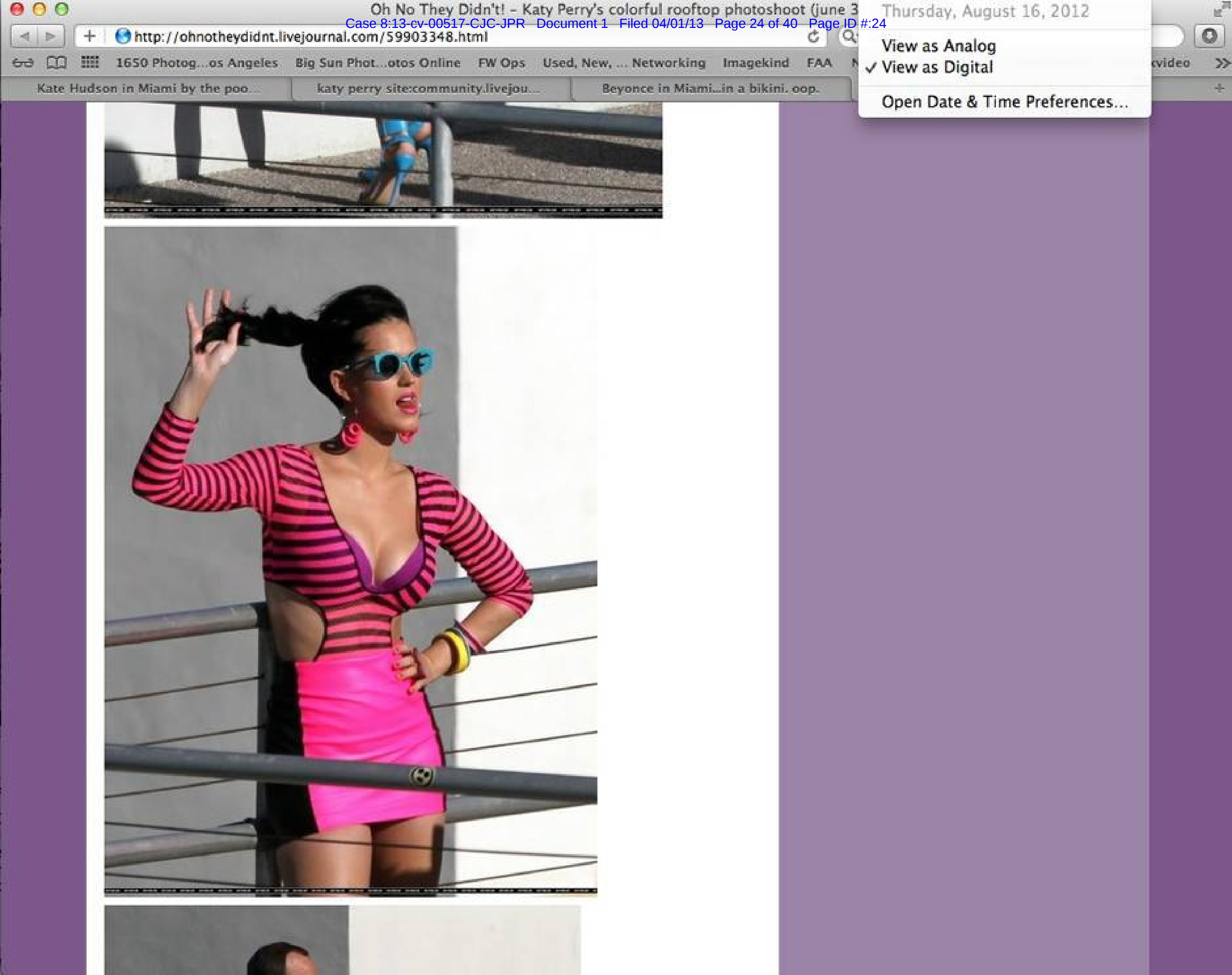
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TAGGED: [katy perry](#)

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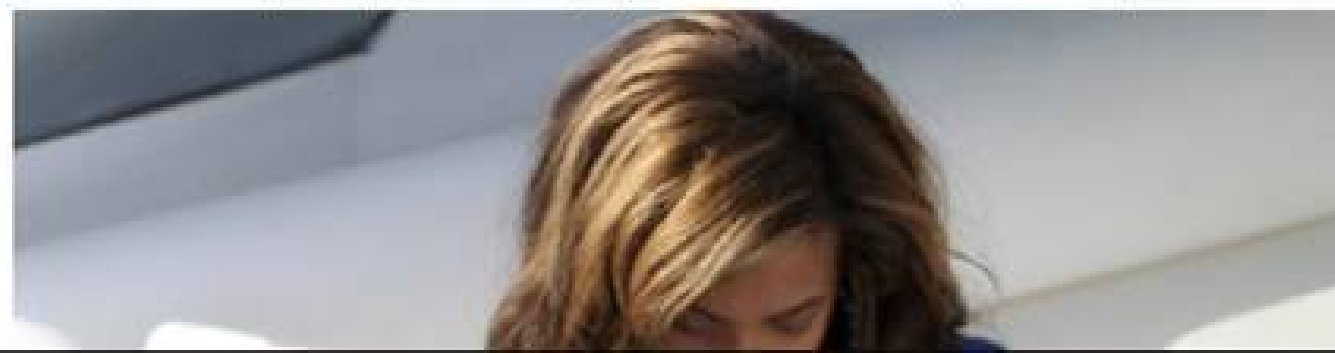
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12:20 pm - 11/15/2011

Beyonce in Miami...in a bikini. oop.



Beyonce, Mama Tina, Jay and Juelz in Miami (11/15/2011)



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More on Miley's hair

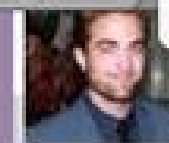
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Beyonce, Mama Tina, Jay and Juelz in Miami (11/15/2011)



Cross Co-Founder tries to...

false_hate, 259 comments



LOL BYE: After 'Ocho Cinco' Arrest, VH1 Pulls "Ev & Ocho"

cassie_epstein, 242 comments



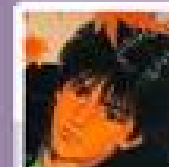
taylor swift buys home next to high school aged boyfriend, 3 weeks ...

msamericandream, 614 comments



Freida Pinto Visits Africa

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More on Miley's hair

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EXHIBIT 4

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-737-808

Effective date of
registration:

September 7, 2010

Title

Title of Work: Popstar Katy Perry in bikini in the Bahamas taken 7/18/2010

Completion/Publication

Year of Completion: 2010

Date of 1st Publication: July 18, 2010

Nation of 1st Publication: United States

Author

■ Author: Mavrix Photo Inc

Author Created: photograph(s)

Work made for hire: Yes

Citizen of: United Kingdom

Domiciled in: United States

Anonymous: Yes

Copyright claimant

Copyright Claimant: Mavrix Photo Inc, dba Mavrix Photo Inc

195 SE 4th Avenue, Deerfield Beach, FL, 33441, United States

Rights and Permissions

Organization Name: Mavrix Photo Inc

Name: Gareth Miles Thomas

Email: gareth@mavrixphoto.com

Telephone: 305-542-9276

Address: 195 SE 4th Avenue

Deerfield Beach, FL 33441 United States

Certification

Name: Gareth Thomas

Date: September 7, 2010



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-797-468

Effective date of
registration:

August 31, 2011

Title

Title of Work: Katy Perry Pink PVC Miami Rooftop shot on 06/03/2011.

Completion/Publication

Year of Completion: 2011

Date of 1st Publication: June 3, 2011

Nation of 1st Publication: United States

Author

■ Author: David Adelson

Author Created: photograph(s)

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Mavrix Photo Inc

195 SE 4th Avenue, Deerfield Beach, FL, 33441, United States

Transfer Statement: By written agreement

Rights and Permissions

Organization Name: Mavrix Photo Inc

Name: Gareth Miles Thomas

Email: gareth@mavrixphoto.com

Telephone: 305-542-9276

Address: 195 SE 4th Avenue

Deerfield Beach, FL 33441 United States

Certification

Name: Gareth Thomas

Date: August 31, 2011

1/0
Registration #: VA0001797468

Service Request #: 1-655276842



Mavrix Photo Inc
Gareth Miles Thomas
195 SE 4th Avenue
Deerfield Beach, FL 33441 United States

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-799-844

Effective date of
registration:
December 28, 2011

Title

Title of Work: Beyonce Miami blue dress baby bump 111311

Completion/Publication

Year of Completion: 2011

Date of 1st Publication: November 13, 2011

Nation of 1st Publication: United States

Author

■ Author: Cullen Reavley

Author Created: photograph(s)

Work made for hire: No

Citizen of: United Kingdom

Domiciled in: United Kingdom

Year Born: 1969

Copyright claimant

Copyright Claimant: Mavrix Photo Inc

195 SE 4th Avenue, Deerfield Beach, FL, 33441, United States

Transfer Statement: By written agreement

Rights and Permissions

Organization Name: Mavrix Photo Inc

Name: Gareth Miles Thomas

Email: [REDACTED]

Telephone: [REDACTED]

Address: [REDACTED]

Certification

Name: Gareth Thomas

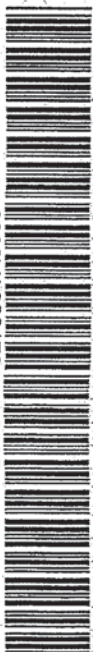
Date: December 28, 2011



Registration #: VA0001799844

Service Request #: 1-703920582

0000VA00017998440202



Mavrix Photo Inc



**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 David O. Carter and the assigned discovery Magistrate Judge is Jean P. Rosenbluth.

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

SACV13- 517 DOC (JPRx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :
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: Peter R. Afrasiabi (SBN 193336)
 Christopher W. Arledge (SBN 200767)
 John Tehranian (Bar. No. 211616)
 ONE LLP, 4000 MacArthur Blvd., W Twr, Ste 1100
 Newport Beach, CA 92660
 Tel: 949-502-2870 Fax: 949-258-5081

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

MAVRIX PHOTOGRAPHS LLC, a California limited
 liability company,

PLAINTIFF(S)

v.

LIVE JOURNAL, INC.; and DOES 1-10, inclusive,

DEFENDANT(S).

CASE NUMBER

SACV13-00517 DOC (JPRx)

SUMMONS

TO: DEFENDANT(S): LIVE JOURNAL, INC.; and DOES 1-10, inclusive

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, Peter R. Afrasiabi, whose address is One LLP, 4000 MacArthur Blvd., 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: 4-1-13

By: Lori Wagers
 Deputy Clerk

LORI WAGERS
(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)].

I. (✓) PLAINTIFFS (Check box if you are representing yourself ☐)

MAVRIX PHOTOGRAPHS LLC, a California limited liability company

DEFENDANTS (Check box if you are representing yourself ☐)

LIVE JOURNAL, INC.; and DOES 1-10, inclusive

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
ONE LLP4000 MacArthur Boulevard, West Tower, Suite 1100
Newport Beach, CA 92660

(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 ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | | | | | |
|---|--------------------------------|--------------------------------|---|---|---|
| Citizen of This State | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | PTF <input checked="" type="checkbox"/> 4 | DEF <input checked="" 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:** \$ 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.)
Copyright Infringement under 17 U.S.C. §§ 101 et seq.**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"/> 463 Alien Detainee	<input checked="" 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 type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property		<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument			<input type="checkbox"/> 535 Death Penalty	
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment			<input type="checkbox"/> 540 Mandamus/Other	
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act			<input type="checkbox"/> 550 Civil Rights	
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)			<input type="checkbox"/> 555 Prison Condition	
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits			<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits			<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract			<input type="checkbox"/> 690 Other	
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability				
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise				
<input type="checkbox"/> 893 Environmental Matters					
<input type="checkbox"/> 895 Freedom of Info. Act					
<input type="checkbox"/> 896 Arbitration					
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision					
<input type="checkbox"/> 950 Constitutionality of State Statutes					

FOR OFFICE USE ONLY: Case Number: **SACV13-00517 DOC (JPRx)**

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



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): SACV13-00338 CJC (JPRx)

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	

(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).

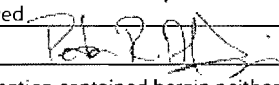
County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	San Francisco

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
NOTE: In land condemnation cases, use the location of the tract of land involved.

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

*Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT):  DATE: 04/01/2013

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))