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Attorneys for Plaintiff
Kaneka Corporation

FILED
11 MAR 22 AM 10:14
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

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

KANEKA CORPORATION, a
Japanese Corporation,

Plaintiff,

vs.

ZHEJIANG MEDICINE CO., LTD., a
Chinese Corporation, ZMC-USA,
L.L.C., a Texas Corporation, XIAMEN
KINGDOMWAY GROUP
COMPANY, a Chinese Corporation,
PACIFIC RAINBOW
INTERNATIONAL INC., a California
Corporation, MITSUBISHI GAS
CHEMICAL COMPANY, INC., a
Japanese Corporation, MAYPRO
INDUSTRIES, INC., a New York
Corporation, and SHENZHO
BIOLOGY & TECHNOLOGY CO.,
LTD., a Chinese Corporation,
Defendants.

Case No. **CV 11-02389** PA (SSX)

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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1 Plaintiff Kaneka Corporation states and alleges for its Complaint the following:
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3 **THE PARTIES**

4 1. Plaintiff Kaneka Corporation (“KANEKA”) is a Japanese corporation with
5 its principal place of business at 3-2-4, Nakanoshima, Kita-ku, Osaka 530-8288,
6 Japan.

7 2. On information and belief, Defendant Zhejiang Medicine Co., Ltd. (“ZMC”)
8 is a Chinese corporation with its principal place of business at No.268 Dengyun Road,
9 Gongshu District, Hangzhou, Zhejiang 310011, China.

10 3. On information and belief, Defendant ZMC-USA, L.L.C. (“ZMC-USA”) is
11 a Texas Corporation with its principal place of business at 1776 Woodstead Court
12 Suite 215, The Woodlands, Texas.

13 4. On information and belief, Defendant Xiamen Kingdomway Group
14 Company (“XKGC”) is a Chinese corporation with its principal place of business at
15 No.33-35 Xinchang Road, Haicang, Xiamen 361022, China.

16 5. On information and belief, Defendant Pacific Rainbow International Inc.
17 (“PRI”) is a California corporation with its principal place of business at 19905
18 Harrison Ave, City of Industry, CA 91789, USA.

19 6. On information and belief, Defendant Mitsubishi Gas Chemical Company,
20 Inc. (“MGCC”) is a Japanese corporation with its principal place of business at
21 Mitsubishi Building, 5-2, Marunouchi 2-chome Chiyoda-ku, Tokyo 100-8324, Japan.

22 7. On information and belief, Defendant Maypro Industries, Inc. (“MAYPRO”)
23 is a New York Corporation with its principal place of business at 550 Mamaroneck
24 Avenue, Harrison, New York, 10528.

25 8. On information and belief, Defendant Shenzhou Biology & Technology Co.,
26 Ltd. (“SBTC”) is a Chinese corporation with its principal place of business at No. 61
27 Zhichun Road, Haidian District, Beijing, 100190, China.
28

1 **JURISDICTION AND VENUE**

2 9. This is an action for patent infringement arising under the patent laws of the
3 United States, 35 U.S.C. § 1 *et seq.* This Court has subject matter jurisdiction under
4 28 U.S.C. §§ 1331 and 1338.

5 10. Venue is proper in this Court under 28 U.S.C. §§ 1391(b)(2) and 1400(b).

6 11. This Court has personal jurisdiction over each of the Defendants as each
7 Defendant transacts substantial business in California (and in this district), or has
8 committed and continues to commit acts of patent infringement in California (and in
9 this district) as alleged in this Complaint.

10
11 **THE PATENT**

12 12. On March 22, 2011, United States Patent No. 7,910,340 (“the ‘340 Patent”)
13 entitled “Processes for Producing Coenzyme Q10,” was duly and legally issued to
14 KANEKA as the assignee of the named inventors.

15
16 **DEFENDANTS’ INFRINGING ACTS**

17 13. The Defendants have actual notice of the ‘340 Patent and the infringement
18 alleged herein at least upon filing of this complaint (if not earlier), pursuant to 35
19 U.S.C. § 287(a).

20 14. On information and belief, ZMC and ZMC-USA have infringed, and
21 continue to infringe, literally or under the doctrine of equivalents, one or more claims
22 of the ‘340 Patent by acting, without authority, so as to import into the United States
23 or offer to sell, sell, or use within the United States, including within this judicial
24 district, Coenzyme Q10 made by a process covered by one or more of the claims of
25 the ‘340 Patent.

26 15. For example, KANEKA obtained a sample of Coenzyme Q10 produced by
27 ZMC, and based on KANEKA’s laboratory analysis of the obtained sample,
28 information on ZMC’s website, and on other information and belief, KANEKA has

1 confirmed that the process used to produce the obtained sample is covered by one or
2 more claims of the '340 Patent. KANEKA obtained a bill of lading that indicates
3 ZMC shipped such Coenzyme Q10 products to ZMC-USA in the United States.

4 16. On information and belief, XKGC and PRI have infringed, and continue to
5 infringe, literally or under the doctrine of equivalents, one or more claims of the '340
6 Patent by acting, without authority, so as to import into the United States or offer to
7 sell, sell, or use within the United States, including within this judicial district,
8 Coenzyme Q10 made by a process covered by one or more of the claims of the '340
9 Patent.

10 17. For example, KANEKA obtained a sample of Coenzyme Q10 produced by
11 XKGC, and based on KANEKA's laboratory analysis of the obtained sample,
12 information on XKGC's website, and on other information and belief, KANEKA has
13 confirmed that the process used to produce the obtained sample is covered by one or
14 more claims of the '340 Patent. KANEKA obtained a bill of lading that indicates
15 XKGC shipped such Coenzyme Q10 products to PRI in the United States.

16 18. On information and belief, MGCC and MAYPRO have infringed, and
17 continue to infringe, literally or under the doctrine of equivalents, one or more claims
18 of the '340 Patent by acting, without authority, so as to import into the United States
19 or offer to sell, sell, or use within the United States, including within this judicial
20 district, Coenzyme Q10 made by a process covered by one or more of the claims of
21 the '340 Patent.

22 19. For example, KANEKA obtained a sample of Coenzyme Q10 produced by
23 MGCC, and based on KANEKA's laboratory analysis of the obtained sample,
24 information on MGCC's website, and on other information and belief, KANEKA has
25 confirmed that the process used to produce the obtained sample is covered by one or
26 more claims of the '340 Patent. KANEKA obtained a bill of lading that indicates
27 MGCC shipped such Coenzyme Q10 products to MAYPRO in the United States.
28

1 20. On information and belief, SBTC has infringed, and continues to infringe,
2 literally or under the doctrine of equivalents, one or more claims of the '340 Patent by
3 acting, without authority, so as to import into the United States or offer to sell, sell, or
4 use within the United States, including within this judicial district, Coenzyme Q10
5 made by a process covered by one or more of the claims of the '340 Patent.

6 21. For example, KANEKA obtained a sample of Coenzyme Q10 produced by
7 SBTC, and based on KANEKA's laboratory analysis of the obtained sample,
8 information on SBTC's website, and on other information and belief, KANEKA has
9 confirmed that the process used to produce the obtained sample is covered by one or
10 more claims of the '340 Patent. KANEKA obtained a bill of lading that indicates
11 SBTC shipped such Coenzyme Q10 products to the United States.

12 22. The above-described acts of infringement committed by Defendants have
13 caused injury and damage to KANEKA, and will cause irreparable injury and
14 damages in the future unless Defendants are enjoined from further infringing the '340
15 Patent.

16 **CLAIM FOR RELIEF**

17 **INFRINGEMENT OF THE '340 PATENT**

18 23. KANEKA incorporates by reference the allegations set forth in paragraphs 1
19 through 15 above as if specifically set forth herein.

20 24. Each of the Defendants have imported and are importing into the United
21 States and/or have offered to sell, sold, or used and are offering to sell, selling and
22 using within the United States Coenzyme Q10 made by a process covered by one or
23 more of the claims of the '340 Patent.

24 25. By importing, offering to sell, selling and/or using Coenzyme Q10 made by
25 a process covered by one or more of the claims of the '340 Patent, Defendants have
26 directly infringed, and are directly infringing the '340 Patent under 35 U.S.C. §
27 271(g).
28

1 26. On information and belief, Defendants have and are actively inducing others
2 to infringe the '340 Patent under 35 U.S.C. § 271(b).

3 27. As a consequence of Defendants' infringement and inducement of
4 infringement, KANEKA is entitled to recover damages adequate to compensate it for
5 the injuries complained of herein. KANEKA is further entitled to have Defendants
6 enjoined from committing additional future acts of infringement which would subject
7 KANEKA to irreparable harm.

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Kaneka Corporation respectfully requests that this Court:


- 11 (a) enter judgment that each of the Defendants has infringed or induced the
12 infringement of one or more claims of the '340 Patent;
- 13 (b) enter judgment that Defendants' infringement of the '340 Patent has been
14 willful, deliberate, and intentional;
- 15 (c) enter a preliminary and permanent injunction, pursuant to 35 U.S.C. § 283,
16 enjoining each of the Defendants, and all of their respective agents, servants,
17 officers, directors, employees, and all other persons acting in concert with them,
18 directly or indirectly, from any further acts of infringement of the '340 Patent;
- 19 (d) enter an order, pursuant to 35 U.S.C. § 284, awarding to KANEKA damages
20 adequate to compensate for infringement of the '340 Patent in an amount to be
21 determined at trial, but not less than a reasonable royalty;
- 22 (e) enter an order, pursuant to 35 U.S.C. § 284, trebling damages for Defendants'
23 willful infringement of the '340 Patent;
- 24 (f) enter an order, pursuant to 35 U.S.C. § 285, deeming this to be an "exceptional
25 case" and thereby awarding KANEKA its reasonable attorneys' fees, costs, and
26 expenses;
- 27 (g) enter an order awarding to KANEKA pre- and post-judgment interest at the
28 maximum rates allowable under the law; and,

1 (h) enter an order awarding to KANEKA such other and further relief, whether at
2 law or in equity, that this Court deems just and proper.
3

4 **DEMAND FOR JURY TRIAL**

5 Pursuant to Rule 38 of the Federal Rules of Civil Procedure and Local Civil
6 Rule 38-1, KANEKA demands a trial by jury on all issues triable as of right by a jury.
7

8 Dated: March 21, 2011



9 Dariush G. Adli
10 Raymond Chan
11 Dave Deonarine

12 **ADLI LAW GROUP P.C.**

13 Attorneys for Kaneka Corporation
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**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 Percy Anderson and the assigned discovery Magistrate Judge is Suzanne H. Segal.

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

CV11- 2389 PA (SSx)

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.

COPY

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Raymond Chan, State Bar No. 220534
Dave Deonarine, State Bar No. 243733
ADLI LAW GROUP P.C.
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Los Angeles, California 90071

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KANEKA CORPORATION, a Japanese Corporation

CASE NUMBER

PLAINTIFF(S)

CV11-02389 PA (SSx)

v.

ZHEJIANG MEDICINE CO., LTD., a Chinese
Corporation, ZMC-USA, L.L.C., a Texas Corporation,
XIAMEN KINGDOMWAY GROUP CO., et al

SUMMONS

DEFENDANT(S).

See Att.

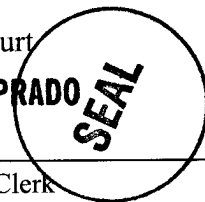
TO: DEFENDANT(S): ZHEJIANG MEDICINE CO., LTD, ZMC-USA, L.L.C, XIAMEN
KINGDOMWAY GROUP COMPANY, PACIFIC RAINBOW INTERNATIONAL INC., et al

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, Darius G. Adli, whose address is 633 West Fifth Street, Suite 5880 Los Angeles, CA 90071. 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

JULIE PRADO



By: _____

Deputy Clerk

Dated: March 22, 2011

(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)].

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 3 Dave Deonarine, State Bar No. 243733
 dave.deonarine@adlilaw.com
 4 **ADLI LAW GROUP P.C.**
 633 West Fifth Street, Suite 5880
 5 Los Angeles, California 90071
 Telephone: 213-623-6546
 6 Facsimile: 213-223-6554

7 Attorneys for Plaintiff
 8 Kaneka Corporation

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

11 **KANEKA CORPORATION, a**
 12 **Japanese Corporation,**
 13
 14 **Plaintiff,**

15 vs.

16 **ZHEJIANG MEDICINE CO., LTD., a**
 17 **Chinese Corporation, ZMC-USA,**
 18 **L.L.C., a Texas Corporation, XIAMEN**
 19 **KINGDOMWAY GROUP**
 20 **COMPANY, a Chinese Corporation,**
 21 **PACIFIC RAINBOW**
 22 **INTERNATIONAL INC., a California**
 23 **Corporation, MITSUBISHI GAS**
 24 **CHEMICAL COMPANY, INC., a**
 25 **Japanese Corporation, MAYPRO**
 26 **INDUSTRIES, INC., a New York**
 27 **Corporation, and SHENZHO**
 28 **BIOLOGY & TECHNOLOGY CO.,**
LTD., a Chinese Corporation,
Defendants.

Case No.:

**COMPLAINT FOR PATENT
 INFRINGEMENT**

DEMAND FOR JURY TRIAL

COPY

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

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) KANEKA CORPORATION	DEFENDANTS ZHEJIANG MEDICINE CO., LTD., ZMC-USA, L.L.C., XIAMEN KINGDOMWAY GROUP COMPANY, PACIFIC RAINBOW INTERNATIONAL INC., MITSUBISHI GAS CHEMICAL CO., INC. et al
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Dariush G. Adli of ADLI LAW GROUP P.C. 633 West Fifth Street, Suite 5880 Los Angeles, CA 90071 TEL: 213-623-6546 FAX: 213-623-6554	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="width: 30%;"></td> <td style="width: 10%; text-align: center;">PTF</td> <td style="width: 10%; text-align: center;">DEF</td> <td style="width: 40%;"></td> <td style="width: 10%; text-align: center;">PTF</td> <td style="width: 10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		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 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 checked="" type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	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 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 checked="" 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: \$** Unlimited

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.)

patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 et seq. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

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

OTHER STATUTES	CONTRACT	TORTS PERSONAL INJURY	TORTS PERSONAL PROPERTY	PRISONER PETITIONS	LABOR
<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	<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 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">REAL PROPERTY</div> <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	<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 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">IMMIGRATION</div> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<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 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">BANKRUPTCY</div> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">CIVIL RIGHTS</div> <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	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus 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 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">FORFEITURE/PENALTY</div> <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	<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 <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">PROPERTY RIGHTS</div> <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">SOCIAL SECURITY</div> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <div style="background-color: #e0e0e0; text-align: center; font-weight: bold; font-size: 8pt;">FEDERAL TAX SUITS</div> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

CV11-02389

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): _____

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
County of Los Angeles, Central	Texas; New York; China; Japan

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

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

* 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): David Date March 22/11.

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))