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10 Attorneys for Plaintiff ICON Health & Fitness, Inc.

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 ICON HEALTH & FITNESS, INC., a
15 Delaware corporation,

16 Plaintiff,

17 v.

18 GARMIN LTD., a Swiss Corporation;
19 GARMIN INTERNATIONAL, INC., a
20 Kansas corporation; and GARMIN USA,
21 INC., a Kansas corporation,

22 Defendants.
23

Case No.: SACV13 - 01067 JST (JPRx)

24 **COMPLAINT**
25 **FOR**
26 **PATENT INFRINGEMENT**

27 **[Demand For Jury Trial]**
28

1 Plaintiff ICON Health & Fitness, Inc. ("ICON" or "Plaintiff") hereby complains
2 against Garmin Ltd., Garmin International, Inc., and Garmin USA, Inc. (collectively
3 "Garmin" or "Defendants") for the causes of action alleged as follows:

4 **THE PARTIES**

5 1. ICON is a corporation duly organized and existing under the laws of
6 Delaware, with its principal place of business located at 1500 South 1000 West, Logan,
7 Utah, 84321.

8 2. Garmin Ltd. is a corporation organized and existing under the laws of
9 Switzerland, with its principal place of business located at Mühlentalstrasse 2, 8200
10 Schaffhausen, Switzerland.

11 3. Garmin International, Inc. is a corporation organized and existing under the
12 laws of the State of Kansas, with its principal place of business located at 1200 E 151st
13 Street, Olathe, Kansas 66062-3426.

14 4. Garmin USA, Inc. is a corporation organized and existing under the laws of
15 the State of Kansas, with its principal place of business located at 1200 E 151st Street,
16 Olathe, Kansas 66062-3426.

17 **JURISDICTION AND VENUE**

18 5. This is a civil action by ICON for patent infringement arising under the
19 patent laws of the United States, including 35 U.S.C. § 271, which gives rise to the
20 remedies specified under 35 U.S.C. §§ 281, 283, 284, and 285.

21 6. This court has original jurisdiction over the subject matter of this action
22 pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

23 7. ICON further alleges on information and belief that Defendants sold or
24 contracted for the sale of infringing goods to consumers within the State of California,
25 including throughout the Central District of California. These actions by Defendants
26 relate to and, in part, give rise to the claims asserted herein by ICON, and have resulted in
27 injury to ICON.
28

8. This Court's exercise of personal jurisdiction over the Defendants is consistent with the Constitutions of the United States and the State of California.

9. ICON alleges on information and belief that Defendants advertise, market, and sell their products through their active website, which is available to persons within the State of California and this judicial district.

10. ICON maintains a place of business located in the Central District of California.

11. Venue is proper in this judicial district pursuant to, at least, 28 U.S.C. § 1391(b) and 28 U.S.C. § 1400(b).

FACTUAL BACKGROUND

12. Kenneth and Greg Anderson (the “Andersons”) are life-long fitness and running enthusiasts with knowledge and expertise in designing running footwear and devices for measuring and tracking athletic performance parameters.

13. The Andersons filed a patent application on January 6, 1995 for a foot mounted apparatus and method to measure locomotive performance parameters of a person during physical exercise, in particular jogging or running. A patent issued upon that application on February 24, 1998 as U.S. Patent No. 5,720,200 (the “Anderson Patent”).

14. ICON is a global leader in the field of exercise and fitness equipment, selling products under numerous well-recognized brands, one of which is the shoe brand Altra Footwear. Altra Footwear is an innovative shoe brand dedicated to running shoes and attire, fitness, and health. Altra Footwear products are distributed from ICON's place of business located within the Central District of California.

15. ICON also is an innovator in fitness monitoring technology, as evidenced by its iFit website and compatible devices and machines. This technology allows users to measure and monitor key exercise parameters and customize workouts based on these parameters.

1 26. Defendants have indirectly infringed and continue to indirectly infringe the
2 Anderson Patent under 35 U.S.C. §§ 271(b) and (c) by actively inducing infringement of
3 or contributorily infringing the Anderson Patent.

4 27. ICON alleges that Defendants provide devices that are especially made to be
5 used, are intended to be used, and are in fact used by Defendants' customers, in a way
6 that infringes the Anderson Patent, and that have no substantial non-infringing uses.

7 28. Since at least about February 2013, Defendants have known, or should have
8 known, that their customers or users of their products infringe the Anderson Patent.

9 29. Because of Defendants' knowledge of the Anderson Patent, Defendants
10 have, and continue to have, the specific intent to induce their customers to infringe the
11 Anderson Patent.

12 30. Defendants' customers do in fact infringe the Anderson Patent, of which
13 infringement Defendants know, or should have known. For example, Defendants instruct
14 their customers to use the Accused Products in a way that infringes the Anderson Patent.
15 Customers are instructed to pair the Foot Pod with a compatible watch via ANT+. The
16 Foot Pod calculates acceleration based, in part, on the customer's movements. The
17 customer is able to view performance parameters on the compatible watch during use of
18 the Accused Products.

19 31. Despite their knowledge of the Anderson Patent, Defendants have continued
20 to infringe and induce others to infringe the Anderson Patent.

21 32. The conduct of Defendants, as set forth hereinabove, gives rise to a cause of
22 action for infringement of the Anderson Patent, pursuant to at least 35 U.S.C. §§ 271 and
23 281.

24 33. ICON alleges on information and belief that Defendants have manufactured,
25 used, sold, and offered for sale Accused Products despite an objectively high likelihood
26 that their actions constitute infringement of the Anderson Patent.

27 34. ICON alleges on information and belief that Defendants' manufacture, use,
28 sale, and offer for sale of Accused Products has been both willful and deliberate.

1 35. Defendants' acts of infringement have caused damage to ICON, and ICON
2 is entitled to recover the damages sustained as a result of Defendants' wrongful acts in an
3 amount subject to proof at trial. Defendants' infringement of ICON's rights under the
4 Anderson Patent will continue to damage ICON's business, causing irreparable harm, for
5 which there is no adequate remedy at law, unless it is enjoined by this Court.

6 36. By reason of the foregoing, ICON is entitled to injunctive and monetary
7 relief against Defendants, pursuant to 35 U.S.C. §§ 283–285.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, ICON prays for judgment against Defendants as follows:

10 A. A judgment finding Defendants liable for infringement of the Anderson
11 Patent;

12 B. An imposition of constructive trust on, and an order requiring a full
13 accounting of, the sales made by Defendants as a result of their wrongful or infringing
14 acts alleged herein;

15 C. An order of this Court pursuant to at least 35 U.S.C. § 283 permanently
16 enjoining Defendants, their agents and servants, and any and all parties acting in concert
17 with them, from: directly or indirectly infringing in any manner the Anderson Patent,
18 whether by making, using, selling, offering to sell, or importing into the United States
19 any product falling within the scope of any of the claims of the Anderson Patent;
20 engaging in acts constituting contributory infringement of any of the claims of the
21 Anderson Patent; or inducing others to engage in any of the aforementioned acts or
22 otherwise;

23 D. An order of this Court pursuant to at least 35 U.S.C. § 283 directing
24 Defendants to destroy their entire stock of infringing products;

25 E. An award of damages to ICON, in an amount to be proven at trial, pursuant
26 to at least 35 U.S.C. § 284;

1 F. Trebling of ICON's damages in view of the willful infringement by
2 Defendants, and the award of such trebled damages to ICON, pursuant to at least 35
3 U.S.C. § 284;

4 G. An award to ICON of prejudgment interest, pursuant to at least 35 U.S.C.
5 § 284;

6 H. An award to ICON of its costs in bringing this action, pursuant to at least 35
7 U.S.C. § 284, and Rule 54(d)(1) of the Federal Rules of Civil Procedure;

8 I. That this Action be declared an exceptional case, and that ICON be awarded
9 its attorneys' fees and expenses, pursuant to at least 35 U.S.C. § 285;

10 J. An award of post-judgment interest, pursuant to at least 28 U.S.C. § 1961(a);
11 and

12 K. For such other and further relief as the Court deems just, proper, and
13 equitable.

14 **DEMAND FOR JURY**

15 ICON demands TRIAL BY JURY of all causes so triable.

16 DATED: July 17, 2013

17 Larry R. Laycock
18 David R. Wright
19 Tyson K. Hottinger
20 Taylor J. Wright
21 MASCHOFF BRENNAN

22 By:

23 
24 Tyson K. Hottinger

25 Attorneys for Plaintiff
26 ICON HEALTH & FITNESS, INC.
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 Jean P. Rosenbluth.

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

SACV13- 1067 JST (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.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ICON HEALTH & FITNESS, INC., a Delaware
corporation,

Plaintiff(s)

v.

GARMIN LTD., a Swiss Corporation; GARMIN
INTERNATIONAL, INC., a Kansas corporation; and
GARMIN USA, INC., a Kansas corporation,

Defendant(s)

SACV13 - 01067 JST (JPRx)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Tyson K. Hottinger
Larry R. Laycock
David R. Wright
Maschoff Brennan
20 Pacifica; Suite 1130, Irvine, CA 92618
(949) 202-1900

If you fail to respond, 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.

Date: JUL 17 2013

CLERK OF COURT

DS Lagan
DODIE LAGMAN

Signature of Clerk or Deputy Clerk



1225

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**I. (a) PLAINTIFFS** (Check box if you are representing yourself ☐)

ICON HEALTH & FITNESS, INC., a Delaware Corporation

DEFENDANTS (Check box if you are representing yourself ☐)

GARMIN LTD., a Swiss Corporation; GARMIN INTERNATIONAL, INC., a Kansas Corporation; GARMIN USA, INC., a Kansas Corporation

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

MASCHOFF BRENNAN - Tyson K. Hottinger
20 Pacifica, Suite 1130, Irvine, CA 92618
(949) 202-1900

(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 type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding
- ☐ 2. Removed from State Court
- ☐ 3. Remanded from Appellate Court
- ☐ 4. Reinstated or Reopened
- ☐ 5. Transferred from Another District (Specify)
- ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION under F.R.Cv.P. 23:** ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ subject to proof at trial**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 under 35 U.S.C. 271.**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 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 checked="" 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	TORTS	PERSONAL PROPERTY	<input type="checkbox"/> 540 Mandamus/Other	SOCIAL SECURITY
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	BANKRUPTCY	FORFEITURE/PENALTY	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 690 Other	FEDERAL TAX SUITS
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157		<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 893 Environmental Matters		<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	LABOR	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 895 Freedom of Info. Act		<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration		<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
	REAL PROPERTY	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 751 Family and Medical Leave Act	
	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 790 Other Labor Litigation	
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 230 Rent Lease & Ejectment		<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	
			<input type="checkbox"/> 448 Education		

FOR OFFICE USE ONLY: Case Number: **SACV13-01067-JST (JPRx)**

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

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): Filed concurrently. A separate Notice of Related Cases will be filed upon receiving case numbers. _____

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
	Delaware and Utah

(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
	Kansas; Switzerland

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

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

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

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

X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT): Tyson Harting DATE: 7/17/13

Notice to Counsel/Parties: The CV-71 (J5-44) 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))