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6 CARLY M.

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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 CARLY M.,

12 Plaintiff,

13 vs.

14 KAISER FOUNDATION HEALTH
15 PLAN, INC.,

16 Defendant.
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CV12-05727 76
Case No.:

COMPLAINT FOR:

BREACH OF THE EMPLOYEE
RETIREMENT INCOME
SECURITY ACT OF 1974;
ENFORCEMENT AND
CLARIFICATION OF RIGHTS;
PREJUDGMENT AND
POSTJUDGMENT INTEREST;
PENALTIES; ATTORNEYS' FEES
AND COSTS

20 Plaintiff CARLY M. herein sets forth the allegations of his Complaint against
21 Defendant KAISER FOUNDATION HEALTH PLAN, INC.
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PRELIMINARY ALLEGATIONS

1. “Jurisdiction” - This action is brought under 29 U.S.C. §§ 1132(a), (e), (f) and (g) of the Employee Retirement Income Security Act of 1974 (hereinafter “ERISA”) as it involves a claim by Plaintiff for employee benefits under an employee benefit plan regulated and governed under ERISA. Jurisdiction is predicated under these code sections as well as 28 U.S.C. § 1331 as this action involves a federal question. This action is brought for the purpose of obtaining benefits under the terms of an employee benefit plan, enforcing Plaintiff’s rights under the terms of an employee benefit plan, and to clarify Plaintiff’s rights to future benefits under the employee benefit plan. Plaintiff seeks relief, including but not limited to: payment of benefits, prejudgment and post-judgment interest, and attorneys’ fees and costs.

2. Plaintiff, CARLY M. is and was at all times relevant, a resident of the City of Chatsworth, California.

3. Plaintiff was at all times relevant a covered participant under a small group plan issued by defendant KAISER FOUNDATION HEALTH PLAN, INC. (“Kaiser” or “the Plan”), an employee welfare benefit plan regulated by ERISA.

4. Plaintiff is informed and believes that the Plan is authorized to transact and transacting business in this judicial district, the Central District of California, and can be found in the Central District of California.

5. The claims at issue herein were specifically administered in this judicial district. Thus, venue is proper in this judicial district pursuant to 29 U.S.C. § 1132(e)(2) (special venue rules applicable to ERISA actions).

FIRST CAUSE OF ACTION
FOR DENIAL OF BENEFITS

6. Plaintiff incorporates by reference paragraphs 1 through 5 as though fully set forth herein.

7. Plaintiff suffers from major depression and panic disorder, severe mental illnesses under the California Mental Health Parity Act, as well as binge eating disorder, anxiety disorder, and mood disorder.

8. Plaintiff has a long history of being denied proper treatment for her mental illnesses by defendant. In 2005, at age 14, she was referred to Weight Watchers by her pediatrician and seen by a social worker at the Kaiser Teen Clinic.

9. In 2006, the social worker referred Plaintiff for an evaluation. Plaintiff was diagnosed with major depression and EDNOS. Plaintiff was placed in the Kaiser Eating Disorders program.

10. In January 2007, Plaintiff's parents met with the Eating Disorders team and were told that the team recommended hospitalizing Plaintiff at BHC Alhambra. Because Plaintiff was still in high school, and the program did not focus on binge eating disorder, Plaintiff decided to stay in the outpatient program.

11. Plaintiff was unable to get regular appointments with a therapist at Kaiser. She therefore saw Adriana Westby Trent, PhD and paid out of pocket from 2007 through 2010.

12. In June of 2010, Plaintiff asked Kaiser for a referral to the day program at Bella Vita. She reported that a normal binge was 44 chicken wings and two fast food meals. She was told said that "wasn't too bad." Eventually, Kaiser approved the referral. Plaintiff was in the program for four weeks. She could not control her eating when she was not in the program. She asked what the higher level of care would be. Plaintiff was told that residential treatment would be the higher level of care, but that her plan did not cover that level of care, so inpatient hospitalization was her only option.

1 13. In July 22, 2010, Plaintiff was admitted to BHC Alhambra for two
2 weeks and six days. She was discharged with only one day's notice and before she
3 was ready to leave. She was told that she was being discharged because she was not
4 underweight.

5 14. In August of 2010, Plaintiff returned to the Bella Vita day program, but
6 the treatment was not intensive enough to control her behaviors. She was referred
7 back to BHC Alhambra's partial hospitalization program. She remained in that
8 program until December 10, 2010, when it was recommended that she attend the
9 two-day a week Eating Disorders program at Sunset Kaiser.

10 15. In December 2010, Plaintiff had an intake interview for the two-day a
11 week Eating Disorders program. Over two months later, Plaintiff was told she could
12 start the program that week, and Plaintiff was scheduled to meet with a psychiatrist.
13 However, by the time Plaintiff returned home, she had a message from Kaiser
14 saying that Plaintiff was no longer eligible for the program because the team was
15 unsure of her commitment, and that Plaintiff had to prove her commitment by
16 attending the emotional overeaters group ten times, at which time she would be re-
17 evaluated.

18 16. Plaintiff met with Kaiser representatives to see if Plaintiff could attend
19 the full day program for depression. The representatives pointed out two times
20 where Plaintiff had set backs in the BHC program as reasons to question Plaintiff's
21 "commitment."

22 17. On February 23, 2011, Plaintiff had an anxiety attack at the Kaiser
23 Sunset office. Her mother took her to Urgent Care, where she was told to take an
24 Ativan.

25 18. In January 2011, Plaintiff started seeing Jaclyn Bauer, Ph.D. as a
26 private patient because Plaintiff could not get proper treatment from Kaiser.

27 19. On August 15, 2011, Dr. Bauer called Plaintiff's father to take Plaintiff
28 to the emergency room because she was suicidal. On August 16, 2011, Plaintiff was

1 admitted to the Mental Health Unit at Kaiser Chinatown on a 72-hour hold. She was
2 released with an appointment to see a case manager for a referral to BHC Alhambra.
3 Her case manager convinced the psychiatrist at Kaiser Chinatown to approve the
4 referral to BHC Alhambra, but the protocol required that her prior psychiatrist make
5 the referral. The prior psychiatrist stalled, and finally called on August 31, 2011 to
6 say that he could make the referral but that Plaintiff would have to meet with him on
7 September 1, 2011.

8 20. Plaintiff met with the psychiatrist on September 1, 2011 and he referred
9 her to BHC Alhambra.

10 21. When she was ready to discharge from BHC Alhambra, Plaintiff
11 requested a referral to residential treatment. Plaintiff's treatment team knew that
12 Plaintiff needed residential level of care. Defendant refused Plaintiff's request for a
13 referral to residential treatment.

14 22. With the help of family and friends, Plaintiff found Avalon Hills
15 Treatment Center in Logan, Utah. Plaintiff was admitted on October 17, 2011.
16 Avalon Hills called Defendant and asked for authorization to treat Plaintiff. On
17 October 19, 2011, Defendant denied the request on the grounds that the treatment is
18 "not a covered benefit." Plaintiff appealed the denial. Defendant upheld the denial
19 on appeal.

20 23. The California Mental Health Parity Act, California *Health & Safety*
21 *Code* Section 1374.72 and *Insurance Code* Section 10144.5 ("Mental Health Parity
22 Act"), requires that a health care service plan or health insurance policy issued,
23 amended or renewed after July 1, 2000, that provides hospital, medical or surgical
24 coverage shall "provide coverage for the diagnosis and medically necessary
25 treatment of severe mental illnesses" and that "severe mental illnesses" include
26 major depression. Under the Mental Health Parity Act, health care service plans and
27 insurance policies must provide all medically necessary treatment, including
28 residential treatment, for members who are suffering from severe mental illnesses,

1 such as major depression. *Harlick v. Blue Shield of California*, -- F.3d --- (9th Cir.
2 2011).

3 24. In *Harlick*, the Ninth Circuit Court of Appeal confirmed that the
4 Mental Health Parity Act requires health care service plans to provide coverage for
5 residential treatment for severe mental illnesses when such treatment is medically
6 necessary, notwithstanding the provision in the plan that purports to exclude such
7 treatment.

8 25. In *Burton v. Blue Shield of California Life & Health Ins. Co.*, 2012 WL
9 242841 (C.D. Cal.), the Honorable R. Gary Klausner followed the *Harlick* decision,
10 and further held that treatment for co-morbid conditions does not preclude the
11 requirement that coverage be provided for the severe mental illness. Thus, under the
12 Mental Health Parity Act (as confirmed by the *Harlick* and *Burton* courts), Plaintiff
13 is entitled to coverage for residential treatment for her major depression, despite any
14 purported lack of coverage in the plan.

15 26. Defendant wrongfully denied Plaintiff's request for a referral to
16 residential treatment, for authorization and/or claim for benefits, in the following
17 respects, among others:

18 (a) Failure to pay medical benefit payments due to Plaintiff at a time
19 when Defendant knew, or should have known, that Plaintiff was entitled to those
20 benefits under the terms of the Plan;

21 (b) Failure to provide prompt and reasonable explanations of the
22 bases relied on under the terms of the Plan documents, in relation to the applicable
23 facts and Plan provisions, for the denial of the claims for medical benefits;

24 (c) After the claims were denied in whole or in part, failure to
25 adequately describe to Plaintiff any additional material or information necessary to
26 perfect the claims along with an explanation of why such material is or was
27 necessary; and
28

(d) Failure to properly and adequately investigate the merits of the claims and/or provide alternative courses of treatment.

27. Plaintiff is informed and believes and thereon alleges that Defendant wrongfully denied the claims for benefits by other acts or omissions of which Plaintiff is presently unaware, but which may be discovered in this litigation and which Plaintiff will immediately make Defendant aware of once said acts or omissions are discovered by Plaintiff.

28. Following the denial of the claims for benefits under the Plan, Plaintiff exhausted all administrative remedies required under ERISA, and performed all duties and obligations on her part to be performed.

29. As a proximate result of the denial of medical benefits, Plaintiff has been damaged in the amount of all of the medical bills incurred for her treatment, in a total sum to be proven at the time of trial.

30. As a further direct and proximate result of this improper determination regarding the medical claims, Plaintiff, in pursuing this action, has been required to incur attorneys' costs and fees. Pursuant to 29 U.S.C. § 1132(g)(1), Plaintiff is entitled to have such fees and costs paid by Defendant.

31. Due to the wrongful conduct of Defendant, Plaintiff is entitled to enforce her rights under the terms of the Plan and to clarify her rights to future benefits under the terms of the Plan.

SECOND CAUSE OF ACTION AGAINST
FOR EQUITABLE RELIEF

32. Plaintiff refers to and incorporates by reference paragraphs 1 through 31 as though fully set forth herein.

33. As a direct and proximate result of the failure of the Defendant to pay claims for medical benefits, and the resulting injuries and damages sustained by

1 Plaintiff as alleged herein, Plaintiff is entitled to and hereby requests that this Court
2 grant Plaintiff the following relief pursuant to 29 U.S.C. § 1132(a)(1)(B):

3 (a) Restitution of all past benefits due to Plaintiff, plus prejudgment
4 and post-judgment interest at the lawful rate;

5 (b) A mandatory injunction requiring Defendant to immediately
6 qualify Plaintiff for medical benefits due and owing under the Plan, and;

7 (c) Such other and further relief as the Court deems necessary and
8 proper to protect the interests of Plaintiff under the Plan.

9
10 **REQUEST FOR RELIEF**

11 Wherefore, Plaintiff prays for judgment against Defendant as follows:

- 12 1. Payment of health insurance benefits due to Plaintiff under the Plan;
13 2. Pursuant to 29 U.S.C. § 1132(g), payment of all costs and attorneys' fees
14 incurred in pursuing this action;
15 3. Payment of prejudgment and post-judgment interest as allowed for under
16 ERISA; and
17 4. For such other and further relief as the Court deems just and proper.

18 Dated: June 29, 2012

KANTOR & KANTOR LLP

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21 By: 

22 Lisa S. Kantor
23 Attorneys for Plaintiff,
24 Carly M.
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) CARLY M.	DEFENDANTS KAISER FOUNDATION HEALTH PLAN, INC.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Lisa S. Kantor, Esq.; Elizabeth K. Green, Esq. Kantor & Kantor, LLP, 19839 Nordhoff St., Northridge, CA 91324 (818) 886-2525	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%;"><tr><td></td><td style="text-align: center;">PTF</td><td style="text-align: center;">DEF</td><td></td><td style="text-align: center;">PTF</td><td style="text-align: center;">DEF</td></tr><tr><td>Citizen of This State</td><td style="text-align: center;"><input checked="" 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 type="checkbox"/> 5</td></tr><tr><td>Citizen or Subject of a Foreign Country</td><td style="text-align: center;"><input 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 checked="" 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 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
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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.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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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.)
29 U.S.C. Section 1132; failure to pay plan benefits

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

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of 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"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input checked="" type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-05727

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
LOS ANGELES	

(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
LOS ANGELES	

(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
LOS ANGELES	

* 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): M. S. Kautz Date June 29, 2012

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))