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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY MLAD

Attorneys for Plaintiff, PAMELA JAHN-DERIAN

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PAMELA JAHN-DERIAN,  
Plaintiff,

v.

METROPOLITAN LIFE INSURANCE  
COMPANY; KAISER PERMANENTE  
GROUP LONG TERM DISABILITY  
INSURANCE PLAN,

Defendants.

Case No..

**CV13-07221** - *Fmd*  
(*SH*)

COMPLAINT FOR:

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

Plaintiff, Pamela Jahn-Derian, herein sets forth the allegations of her  
Complaint against Defendants Metropolitan Life Insurance Company, and Kaiser  
Permanente Group Long Term Disability Insurance Plan.

**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

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Clerk, U.S. District Court

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1 involves a federal question. This action is brought for the purpose of recovering  
2 benefits under the terms of an employee benefit plan, enforcing Plaintiff's rights  
3 under the terms of an employee benefit plan, and to clarify Plaintiff's rights to future  
4 benefits under the employee benefit plan named as Defendant. Plaintiff seeks relief,  
5 including but not limited to: payment of benefits, prejudgment and postjudgment  
6 interest, reinstatement to the benefit plans at issue herein, and attorneys' fees and  
7 costs.

8         2. Plaintiff was at all times relevant, an employee of Kaiser Foundation  
9 Healthplan, Inc., and a resident in the County of Ventura, State of California.

10         3. Plaintiff is informed and believes that Defendant Metropolitan Life  
11 Insurance Company ("MetLife") is a corporation with its principal place of business  
12 in the State of New York, authorized to transact and transacting business in the  
13 Central District of California, and can be found in the Central District of California.  
14 MetLife is the insurer of benefits under the Kaiser Permanente Group Long Term  
15 Disability Insurance Plan, (hereinafter "LTD Plan") and acted in the capacity of a  
16 plan administrator. MetLife administered the claim with a conflict of interest, and  
17 the bias this created affected the claims determination.

18         4. Plaintiff is informed and believes that Defendant LTD Plan is an  
19 employee welfare benefit plan regulated by ERISA, established by Kaiser  
20 Foundation Healthplan, Inc. under which Plaintiff is and was a participant, and  
21 pursuant to which Plaintiff is entitled to Long Term Disability ("LTD") benefits.  
22 Pursuant to the terms and conditions of the LTD Plan, Plaintiff is entitled to LTD  
23 benefits for the duration of Plaintiff's disability, for so long as Plaintiff remains  
24 disabled as required under the terms of the LTD Plan. The LTD Plan is doing  
25 business in this judicial district, in that it covers employees residing in this judicial  
26 district.

27         5. Defendants can be found in this judicial district and the Defendant Plan  
28 is administered in this judicial district. The LTD claim at issue herein was also

1 specifically administered in this judicial district. Thus, venue is proper in this  
2 judicial district pursuant to 29 U.S.C. § 1132(e)(2).

3  
4 **FIRST CLAIM FOR RELIEF**  
5 **AGAINST METROPOLITAN LIFE INSURANCE COMPANY AND KAISER**  
6 **PERMANENTE GROUP LONG TERM DISABILITY INSURANCE PLAN,**  
7 **FOR PLAN BENEFITS, ENFORCEMENT AND CLARIFICATION OF**  
8 **RIGHTS, PREJUDGMENT AND POSTJUDGMENT INTEREST, AND**  
9 **ATTORNEYS' FEES AND COSTS**  
10 **(29 U.S.C. § 1132(a)(1)(B))**

11 6. Plaintiff incorporates by reference all preceding paragraphs as though  
12 fully set forth herein.

13 7. At all times relevant, Plaintiff was employed by Kaiser Foundation  
14 Healthplan, Inc. and was a covered participant under the terms and conditions of the  
15 LTD Plan.

16 8. During the course of Plaintiff's employment, Plaintiff became entitled  
17 to benefits under the terms and conditions of the LTD Plan. Specifically, while  
18 Plaintiff was covered under the LTD Plan, Plaintiff suffered a disability rendering  
19 Plaintiff disabled as defined under the terms of the LTD Plan.

20 9. Pursuant to the terms of the LTD Plan, Plaintiff made a claim to  
21 MetLife for LTD benefits under the LTD Plan. Plaintiff's last date of work was  
22 September 19, 2011. Thereafter, Plaintiff made a claim for benefits under the LTD  
23 Plan.

24 10. In a letter dated August 24, 2012, and signed by MetLife's Kathy  
25 Enggas, MetLife advised plaintiff that she did not qualify for benefits under the  
26 LTD Plan because, in MetLife's opinion, Plaintiff had not provided sufficient  
27 evidence of her disability.  
28

1 11. Plaintiff appealed MetLife's termination of LTD benefits. On April 8,  
2 2013, despite overwhelming evidence of a covered LTD claim, MetLife upheld its  
3 denial of benefits.

4 12. Following the denial of benefits under the LTD Plan, Plaintiff  
5 communicated to MetLife that it had not obtained certain of Plaintiff's medical  
6 information as MetLife's requests to her doctors had not been received by said  
7 doctors. Plaintiff supplied additional medical information which MetLife  
8 considered. On September 23, 2013, MetLife wrote to plaintiff advising that after  
9 considering the additional evidence, it was upholding its decision to deny benefits.  
10 Plaintiff has exhausted all administrative remedies required under ERISA, and has  
11 performed all duties and obligations on Plaintiff's part to be performed under the  
12 LTD Plan.

13 13. Defendants MetLife and the LTD Plan breached the Plan and violated  
14 ERISA in the following respects in that they:

15 (a) Failed to pay LTD benefit payments to Plaintiff at a time when  
16 MetLife and the LTD Plan knew, or should have known, that Plaintiff was  
17 entitled to those benefits under the terms of the LTD Plan, as Plaintiff was  
18 disabled and unable to work and therefore entitled to benefits. Even though  
19 the LTD Plan and MetLife had such knowledge, MetLife denied Plaintiff's  
20 LTD benefits;

21 (b) Failed to provide a prompt and reasonable explanation of the  
22 basis relied on under the terms of the LTD Plan documents, in relation to the  
23 applicable facts and LTD Plan provisions, for the denial of Plaintiff's claims  
24 for LTD benefits;

25 (c) After Plaintiff's claim was denied in whole or in part, MetLife  
26 failed to adequately describe to Plaintiff any additional material or  
27 information necessary for Plaintiff to perfect his/her claim along with an  
28 explanation of why such material is or was necessary;

(d) Concealed and withheld from Plaintiff the notice requirements MetLife and the LTD Plan were required to provide Plaintiff pursuant to ERISA and the regulations promulgated thereunder, particularly Code of Federal Regulations § 2560.503-1(f)-(g), inclusive; and

(e) Failed to properly and adequately investigate the merits of Plaintiff's disability claim and failed to provide a full and fair review of Plaintiff's claim.

14. Plaintiff is informed and believes and thereon alleges that Defendants wrongfully denied her disability benefits under the LTD Plan by other acts or omissions of which Plaintiff is presently unaware, but which may be discovered in this future litigation and which Plaintiff will immediately make Defendants aware of once said acts or omissions are discovered by Plaintiff.

15. As a proximate result of the aforementioned wrongful conduct of the LTD Plan and MetLife, and each of them, Plaintiff has damages for loss of disability benefits in a total sum to be shown at the time of trial.

16. As a further direct and proximate result of this improper determination regarding Plaintiff's LTD claim, 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 Defendants.

17. The wrongful conduct of the LTD Plan and MetLife has created uncertainty where none should exist, therefore, Plaintiff is entitled to enforce her rights under the terms of the LTD Plan and to clarify her right to future benefits under the terms of the LTD Plan.

### **REQUEST FOR RELIEF**

WHEREFORE, Plaintiff prays for relief against Defendants as follows:

1. Payment of disability benefits due Plaintiff;
2. An order declaring that Plaintiff is entitled to immediate reinstatement

1 to the LTD Plan and benefits thereunder, with all ancillary benefits to which she is  
2 also entitled by virtue of her disability, and that benefits are to continue to be paid  
3 under the LTD Plan for so long as Plaintiff remains disabled under the terms of the  
4 LTD Plan;

5 3. In the alternative to the relief sought in paragraphs 1 and 2, an order  
6 remanding Plaintiff's claim to the claims administrator to the extent any new facts  
7 or submissions are to be considered;

8 4. Pursuant to 29 U.S.C. § 1132(g), payment of all costs and attorneys'  
9 fees incurred in pursuing this action;

10 5. Payment of prejudgment and postjudgment interest as allowed for  
11 under ERISA; and

12 6. Such other and further relief as this Court deems just and proper.

13  
14  
15 Dated: September 27, 2013

KANTOR & KANTOR LLP

16  
17  
18 By: 

Alan E. Kassan  
Brent Dorian Brehm  
Attorneys for Plaintiff

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

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) Pamela Jahn-Derian	<b>DEFENDANTS</b> Metropolitan Life Insurance Company; Kaiser Permanente Group Long Term Disability Insurance Plan
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Kantor & Kantor LLP - (818) 886-2525 19839 Nordhoff Street Northridge, CA 91324	Attorneys (If Known)

<b>II. BASIS OF JURISDICTION</b> (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)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:35%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	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 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.)

<b>OTHER STATUTES</b> <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	<b>CONTRACT</b> <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 <b>REAL PROPERTY</b> <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	<b>TORTS</b> <b>PERSONAL INJURY</b> <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 <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <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 <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <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	<b>PRISONER PETITIONS</b> <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 <b>FORFEITURE / PENALTY</b> <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	<b>LABOR</b> <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 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <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)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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**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
Ventura	

(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
	New York

(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
Ventura	

\* 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): \_\_\_\_\_ Date September 27, 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. (g))