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7 *Attorneys for Plaintiff*

*General Electric Company*

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION

11  
12 GENERAL ELECTRIC COMPANY,  
13

14 Plaintiff,

15 v.

16 NEUROGRAFIX; NEUROGRAPHY  
17 INSTITUTE MEDICAL ASSOCIATES, INC.;  
18 IMAGE-BASED SURGICENTER  
CORPORATION; and WASHINGTON  
19 RESEARCH FOUNDATION,  
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21 Defendants.  
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CV 12-04586 SJO (JGx)

Case No. 04586 SJO (JGx)  
GENERAL ELECTRIC COMPANY'S  
COMPLAINT FOR DECLARATORY  
JUDGMENT

DEMAND FOR JURY TRIAL

FILED  
12 MAY 25 AM 11:37  
CLERK OF COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES

**RELATED CASE**

1  
2 1. This case is related to case 2:11-cv-07591-MRP-RZ ("Related Case"), in which  
3 Defendants, NeuroGrafix, Neurography Institute Medical Associates, Inc., Image-Based Surgicenter  
4 Corporation and Washington Research Foundation (collectively, "Defendants"), have asserted  
5 infringement of U.S. Patent No. 5,560,360 ("the '360 patent") by The Regents of the University of  
6 California ("The Regents"), in part, based upon The Regents' use of MRI products sold by General  
7 Electric Company ("GE").

8 2. Having been granted leave to intervene in the Related Case, GE, by and through its  
9 attorneys, brought an intervenor complaint for declaratory judgment of non-infringement and invalidity  
10 against the Defendants. Since GE intervened in the Related Case and filed its intervenor complaint,  
11 Defendants have taken the position that GE's role in the case is limited to defending Defendants'  
12 claims against The Regents as they relate to GE's products. While GE disagrees with Defendants'  
13 position, out of an abundance of caution GE brings this complaint for declaratory judgment of non-  
14 infringement and invalidity against Defendants, and in support thereof alleges as follows:

15 **THE PARTIES**

16 3. Plaintiff GE is a corporation that is organized and existing under the laws of the State of  
17 New York, with its principal place of business at 3135 Easton Turnpike, Fairfield, CT 06828.

18 4. Upon information and belief, Defendant NeuroGrafix is a California corporation with  
19 its principal place of business located at 2716 Ocean Park Boulevard, Suite 3075, Santa Monica,  
20 California.

21 5. Upon information and belief, Defendant Neurography Institute Medical Associates,  
22 Inc., is a California corporation with its principal place of business in Santa Monica, California.

23 6. Upon information and belief, Defendant Image-Based Surgicenter Corporation is a  
24 California corporation with its principal place of business in Santa Monica, California.

25 7. Upon information and belief, Defendant Washington Research Foundation is a not-for-  
26 profit corporation that is incorporated and existing under the laws of the State of Washington.

27 **JURISDICTION AND VENUE**

8. This action arises under the patent laws of the United States of America, 35 U.S.C. § 1 *et seq.* This Court has federal subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332, 1367, 1338(a), 2201 and 2202.

9. This Court has personal jurisdiction over the Defendants, and venue is proper in this Court pursuant to 28 U.S.C. § 1391(b), (c), and by virtue of the Defendants having availed themselves of this forum when they filed their complaint against The Regents of the University of California in the Related Case.

### **FACTUAL ALLEGATIONS**

10. Defendants contend that the University of Washington is the owner by assignment of the '360 patent, entitled "Image Neurography and Diffusion Anisotropy Imaging." (Related Case Dkt. 1, Ex. B.)

11. Defendants contend that Washington Research Foundation holds substantially all rights in the '360 patent and that it exclusively licensed substantially all rights in the '360 patent to NeuroGrafix in December, 1998, retaining only certain potential reversion rights.

12. Defendants have a history of asserting the '360 patent, having already sued Siemens Medical Solutions USA, Inc. and Siemens Aktiengesellschaft in the United States District Court for the Central District of California (Case No. 10-1990-MRP(RZX)), and having asserted infringement claims against The Regents of the University of California in the Related Case.

13. Defendants have publicly indicated that they intend to assert the '360 patent against other GE customers. NeuroGrafix's website contains the following "NeuroGrafix Statement on U.S. Patent 5,560,360," which is dated November 23, 2011:

At this time, NeuroGrafix advises & reminds users of MR Neurography, Diffusion Tensor Imaging (DTI, HARDI, and Q-Ball), or Diffusion Subtraction Neurography that they may be infringing US Patent 5,560,360 and its foreign equivalents if they are in the US, Japan, Europe, Canada or Australia if neither they nor their MRI manufacturer has a license. Please contact NeuroGrafix by email with any inquiries.

There may be no license in place for users of MRI equipment from GE, Philips, Toshiba, or BrainLab.

Patent infringement litigation between NeuroGrafix and the Regents of the University of California is ongoing in U.S. Federal District Court.

1 Aaron Filler, MD, PhD, the CEO of NeuroGrafix says: "NeuroGrafix intends to  
2 continue to assert its patent rights against unlicensed infringers."

3 14. Defendants contend that certain "magnetic resonance hardware and software products  
4 capable of diffusion anisotropy imaging ('DAI'), diffusion tensor imaging ('DTI') and/or DTI  
5 tractography" infringe claims of the '360 patent including, but not necessarily limited to, the GE 1.5T  
6 SignaHDx, GE Signa LX, GE 1.5T Signa, GE 1.5T Signa Echospeed, GE 1.5T EXCITE HD, GE 3T  
7 Signa HD, and GE 3T EXCITE magnetic resonance imaging systems, including unidentified  
8 "software," "associated workstations" and "upgrade packages required ... to perform DAI, DTI and/or  
9 DTI tractography" (the "Accused Products").

10 15. Specifically, Defendants have alleged that The Regents use of the Accused Products  
11 infringe certain claims of the '360 patent. Defendants have identified the claims alleged to be  
12 infringed as claims 36, 37, 39-44, 46, 47, 49-54, 63-66 (the "Asserted Claims").

13 16. In addition, in response to GE's intervenor complaint, Defendants have asserted a  
14 counterclaim against GE for inducing The Regents alleged infringement and have reserved the right to  
15 assert claims of direct and indirect infringement against GE beyond the scope of NeuroGrafix's current  
16 claims against The Regents. (Related Case Dkt. 82 at 4 n.1.)

17 17. GE sells MRI products that Defendants have alleged, either by their public statements  
18 or in the Related Case, infringe the '360 patent (the "GE Products").

19 18. In light of the Defendants' public statements, as well as their litigation history, GE  
20 reasonably believes that Defendants may sue GE or its customers for patent infringement based upon  
21 the GE Products. Thus, the parties have a definite and concrete controversy.

22 19. GE believes that it has a right to make, use, import, offer to sell and/or sell the GE  
23 Products free of any valid patent rights of the Defendants. GE also believes that the '360 patent is  
24 invalid.

25 **FIRST CAUSE OF ACTION: DECLARATION OF NON-INFRINGEMENT**

26 20. GE repeats the allegations of the above paragraphs as if fully set forth herein.

27 21. Defendants have asserted the '360 patent against The Regents, a GE customer, in the  
28 Related Case, alleging that the Accused Products and The Regents' use of the Accused Products

1 infringes the '360 patent. Specifically, Defendants have asserted claims 36, 37, 39-44, 46, 47, 49-54,  
2 63-66 ("Asserted Claims") against The Regents.

3 22. Defendants have made public statements alleging that GE and/or its customers infringe  
4 the '360 patent by their making, using, selling, offering to sell and/or importing the GE Products.

5 23. The GE Products do not infringe any claim of the '360 patent, and use of the GE  
6 Products does not indirectly infringe any claim of the '360 patent, pursuant to 35 U.S.C. § 271.

7 24. There is an actual, substantial and continuing justiciable controversy between GE and  
8 the Defendants having adverse legal interests of sufficient immediacy and reality to warrant the  
9 issuance of a declaratory judgment regarding non-infringement of the '360 patent.

10 25. GE is entitled to a judicial declaration that the GE Products do not infringe any claim of  
11 the '360 patent, and that use of the GE Products does not indirectly infringe any claims of the '360  
12 patent.

13 **SECOND CAUSE OF ACTION: DECLARATION OF INVALIDITY**

14 26. GE repeats the allegations of the above paragraphs as if fully set forth herein.

15 27. The claims of the '360 patent are invalid for failure to comply with one or more  
16 requirements of Title 35, United States Code, including, 35 U.S.C. §§ 101, 102, 103 and 112.

17 28. There is an actual, substantial and continuing justiciable controversy between GE and  
18 the Defendants having adverse legal interests of sufficient immediacy and reality to warrant the  
19 issuance of a declaratory judgment regarding the validity of the '360 patent.

20 29. GE is entitled to a judicial declaration that the claims of the '360 patent are invalid.

21 **DEMAND FOR JURY TRIAL**

22 30. GE demands a trial by jury on all issues so triable.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, GE respectfully seeks the following relief from this Court:

25 (a) A declaration and entry of judgment in favor of GE and against Defendants that the GE  
26 Products do not infringe any claims of the '360 patent;

1 (b) A declaration and entry of judgment in favor of GE and against Defendants that GE and  
2 GE's customers, including The Regents, are not liable for direct, contributory or induced infringement  
3 of any claim of the '360 patent as to the GE Products;

4 (c) A declaration and entry of judgment in favor of GE and against Defendants that the  
5 claims of the '360 patent are invalid under 35 U.S.C. §§ 101, 102, 103 and/or 112;

6 (d) Defendants and their officers, agents, employees, representatives, counsel and all  
7 persons in active concert or participation with any of them, directly or indirectly, be enjoined from  
8 threatening or charging infringement of, or instituting any action for infringement of the '360 patent,  
9 based upon the GE Products;

10 (e) Its costs and disbursements in connection with this litigation, as permitted pursuant to  
11 35 U.S.C. § 284;

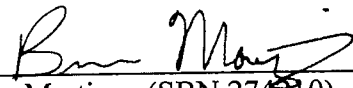
12 (f) A determination that this is an exceptional case within the meaning of 35 U.S.C. § 285,  
13 and an award to GE of its reasonable attorney's fees; and

14 (g) Such other relief, in law and in equity, that this Court deems appropriate.  
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1 Dated: May 25, 2012

Respectfully submitted,

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3 By:

  
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14 *Attorneys for Plaintiff General Electric Company*  
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## Name &amp; Address:

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UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

GENERAL ELECTRIC COMPANY,

PLAINTIFF(S)

v.

NEUROGRAFIX; NEUROGRAPHY INSTITUTE  
 MEDICAL ASSOCIATES, INC.; IMAGE-BASED  
 SURGICENTER CORPORATION; WASHINGTON  
 RESEARCH FOUNDATION

DEFENDANT(S).

CASE NUMBER

CV12-04586 SJO(JCG)

## SUMMONS

TO: DEFENDANT(S):

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, Jennifer Sklenar, whose address is ARNOLD & PORTER LLP, 777 S. Figueroa St., 44th Floor, Los Angeles, CA 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: May 25, 2012

By: \_\_\_\_\_

Deputy Clerk

(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)].



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

**I (a) PLAINTIFFS** (Check box if you are representing yourself ☐)

GENERAL ELECTRIC COMPANY

**DEFENDANTS**

NEUROGRAFIX; NEUROGRAPHY INSTITUTE MEDICAL ASSOCIATES, INC.; IMAGE-BASED SURGICENTER CORPORATION; and WASHINGTON RESEARCH FOUNDATION

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

Arnold & Porter LLP - Jennifer A. Sklenar (Bar No. 200434)  
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**Attorneys (If Known)**

Marc A. Fenster  
Russ August & Kabat  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025

**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.)

- |   | 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 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 ☐ 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: \$** \_\_\_\_\_

**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.)  
Declaratory Judgment

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

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	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 <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>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>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	<input type="checkbox"/> 510 Motions to Vacate Sentence <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 <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	<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 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input checked="" 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

**CV12-04536**

**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): 2:11-CV-07591 M.R.P. (R.E.X.)

**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
	Connecticut

- (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 County Washington	

- (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 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 PRO PER):

*B. Maniz*

Date

5/25/12

**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))