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

BY _____

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Attorneys for Plaintiff
Doctors on Liens, Inc.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DOCTORS ON LIENS, INC, a California corporation, Plaintiff, - vs - ORTHOPEADIC DOCTORS ON LIENS, INC., a (suspended) California corporation; and CHARLES PEREZ, an individual.	Case No.: CV12-10988-DMG (AGRx) **COMPLAINT FOR TRADEMARK INFRINGEMENT; FALSE DESIGNATION OF ORIGIN; FEDERAL TRADEMARK DILUTION; TRADEMARK DILUTION UNDER CALIFORNIA LAW; COMMON LAW UNFAIR COMPETITION** **(Jury Trial Demanded)**

Plaintiff, Doctors on Liens, Inc. ("DOL") complains and alleges against Defendants, Orthopaedic Doctors On Liens, Inc. ("Ortho") and Charles Perez ("Perez") (collectively "Defendants"), as follows:

PARTIES

1. DOL is a corporation incorporated pursuant to the laws of the State of California.

2. Upon information and belief, Defendant Ortho is a (suspended) corporation incorporated pursuant to the laws of State of California, as shown in Exhibit 1.

3. Upon information and belief, Defendant Perez is an individual and a citizen of California whose address is not presently known.

4. On information and belief, Perez is the alter ego of Ortho, which he continues to hold out and operate as a valid California corporation notwithstanding its suspended status. *See*, Exhibit 1.

JURISDICTION AND VENUE

5. The present action is based upon infringement of the Lanham Act, 15 U.S.C. §1051, *et seq.* and related claims of unfair competition and trademark dilution, under the statutory and common law of the State of California. This Court has subject matter jurisdiction over the Federal trademark claims under 28 U.S.C. §§

1121(a), 1331, and 1338(a) on the basis that the claims and controversy herein arise under the trademark laws of the United States.

6. This Court has subject matter jurisdiction over the remaining claims pursuant to 28 U.S.C. § 1367, as those claims are related to and arise from the same set of facts as DOL's trademark infringement claims.

7. This Court has personal jurisdiction over Defendants, because Defendants reside in, and do business within, this judicial district and the acts complained of occurred in this judicial district.

8. Venue of this action in this district is appropriate pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to DOL's claims occurred in this district.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

9. DOL has been in business since 1995.

10. DOL's primary business is to provide referrals to medical doctors, doctors of osteopathy, chiropractors, and specialists, including orthopaedic doctors, particularly with respect to individuals who have been injured by a third party and who require medical treatment prior to resolving any claim which they may have against such third party.

11. The doctors and medical professionals who receive DOL's referrals have agreed to handle the treatments and procedures needed by the patient on a "lien"

basis, *i.e.*, they receive payment for their services when their patient's claim against a third party is resolved.

12. DOL's referrals allow injured parties to receive medical care even though they may not have funds or insurance available immediately.

13. Access to medical care and treatment also affords the injured party and his/her attorney with timely reports as to the injuries sustained, whereby the injured party's "case value" is often enhanced.

14. In view of the benefits derived by the injured party, his/her attorney, and the treating doctors, DOL has been highly successful in its business.

15. Specifically, DOL represents medical professionals who are clients of DOL.

16. DOL is very selective as to which medical professionals it will represent, and it will generally represent only a single medical office in a particular city.

17. DOL vets those medical professionals who wish to be represented by DOL, whereby they are reputable and ethical in their practices.

18. DOL maintains a listing of those medical professionals who are customers of DOL. The list, also called "the Map", a portion of which is shown in Exhibit 2, is provided, free of charge, to attorneys who are able to refer their clients (often victims of accidents or work relate injuries) to the medical professionals on the Map (based upon the respective locations of their clients and the medical

professionals), knowing that the medical professionals on the Map have been fully vetted by DOL as to their credentials, ethics, and locations.

19. Due to the very limited nature of the medical professionals who DOL has chosen to represent, and due to the high standards which they must have and maintain to gain acceptance as clients of DOL, medical professionals in geographic areas already represented by DOL have waited as long as eight years to be accepted as clients of DOL.

20. Notably, there is no such thing as a "doctor on lien"; nor are there any persons or professionals who can be described as "doctors on liens".

21. The mark "Doctors on Liens" is a mark that was coined by DOL for use in connection with its business of providing advertising and referrals to various medical professionals who have agreed to provide their medical services on a "lien" basis.

22. DOL is the owner of all right, title and interest in the trademark, "Doctors on Liens (with Design)" which was registered in the U.S. Patent and Trademark Office as U.S. Reg. No. 2,920,498 on January 25, 2005 ("the '498 Registration"), based on use since 1995. *See*, Exhibit 3.

23. The "Doctors on Liens" mark is a fanciful mark, and the '498 Registration now has incontestable status pursuant to federal law, whereby it is entitled to a very high degree of protection. *See*, Exhibit 3.

24. DOL is also the owner of all right, title and interest in the trademark, "Doctors on Liens" which was filed in the U.S. Patent and Trademark Office as U.S. Ser. No. 85798043 on December 7, 2012 ("the '043 Application"), based on use since 1995.

25. Together the "Doctors On Liens" marks in '498 Registration and the '043 Application are referred to herein as the DOL Marks.

26. As a result of its widespread use and extensive marketing efforts, DOL has developed extremely valuable goodwill in the DOL Marks.

27. Long after DOL began business, and long after DOL adopted and used the DOL Marks in connection with its business, Defendant Orthopaedic Doctors on Liens, Inc. ("Ortho") began operation of a business in competition with DOL.

28. In connection with its business, Ortho began to operate a website at the domain, http://www.orthodocsonliens.com, which domain name incorporates the common nickname for doctors, *i.e.* "docs", together with the "on liens" portion of the DOL Marks to promote its business, whereby with the addition of "ortho" (a common nickname for an "orthopaedic doctor") Ortho's domain name adopted the DOL Marks.

29. Defendant Ortho's website, a true copy of a portion of which is attached as Exhibit 4 prominently displays the name "Orthopaedic Doctors On Liens, Inc." on two lines with the word "Orthopaedic" appearing in a different type style, color,

and size than "Doctors On Liens, Inc." in a transparent effort to fully adopt and use both Plaintiff's name and the DOL Marks.

30. The Ortho website specifically includes both Plaintiff's name and the DOL Marks, prominently, multiple times.

31. Ortho has been regularly and actively engaged in the unauthorized infringement and unlicensed, imitative use of the DOL Marks in conjunction with the advertising, marketing and promotion of its services in competition with DOL, in the same or similar geographic areas as DOL.

32. Such infringing uses have extended to both media advertising and print media, as shown in Exhibit 5.

33. Upon information and belief, Ortho is, and has been, offering its services under the infringing "Orthodaedic Doctors on Liens" mark ("the Infringing Mark") in direct competition with DOL.

34. The ongoing offer for sale to the public of competing services under the Infringing Mark is, and has been, without permission or authority of DOL and without any legitimate license to the DOL Marks.

35. By using the Infringing Mark and offering services for sale, Ortho has misrepresented and falsely described to the general public the origin and source of Ortho's services in a manner calculated to deceive the public and deliberately create the likelihood of confusion, or cause mistake, or to deceive as to the

affiliation, connection or association of Ortho with DOL, or as to the origin, sponsorship or approval of Ortho's services, or commercial activities by the ultimate purchaser as to the source and sponsorship of Ortho's services.

36. Upon information and belief, with full knowledge of the existence of DOL, the DOL Marks, and DOL's exclusive rights to the DOL Marks, Ortho intended to, and did, trade on the goodwill associated with the DOL Marks, and Ortho has misled and confused, and will continue to mislead and confuse the public.

37. Ortho advertised, marketed and promoted, and continues to advertise, market, and promote, services using the "orthodocsonliens.com" domain name and print media, thus creating a likelihood of confusion, deception, and mistake as to the affiliation, connection, or association of Ortho's goods, services, and/or commercial activities with those of DOL.

38. The widespread use by Ortho of the Infringing Mark constitutes a willful and knowing use of a false designation of origin and a false description or representation in commerce.

39. The imitation, reproduction, and unauthorized use of the Infringing Mark by Ortho causes irreparable injury to DOL, including injury to its business reputation and a dilution and a garnishment of the distinctive quality of the DOL Marks.

40. On information and belief, the owner of Ortho is Defendant Charles Perez ("Perez").

41. Notwithstanding the suspended status of Ortho, Perez continues to operate Ortho as its alter ego as though it was a legitimate California corporation, thereby further misleading the public.

42. DOL employee and Board Member Geri Ditto has asked Mr. Perez to cease and desist from using the Infringing Mark as Ortho's use thereof has caused, and continues to cause, actual confusion with the DOL Marks.

43. Mr. Perez agreed to "See what I can do" about having Ortho stop using the Infringing Mark after having been asked to do so by Ms. Ditto.

44. Notwithstanding Defendant Perez's indication that Ortho would stop use of the Infringing Mark, DOL received a number of phone calls relating to an "open house" for a surgery center in Oceanside.

45. Specifically, a number of customers of DOL were confused by the announcements made by Defendants, thinking that the "open house" was being hosted by DOL, rather than by Defendants.

46. In an effort to avoid litigation, Ms. Ditto again spoke with Perez about why he not only failed to honor his commitment to stop using the Infringing Mark but went on to host an "open house" knowing that Defendants' use of the Infringing Mark would further add to the confusion caused by Defendants' infringements.

47. In that conversation, Defendant Perez openly admitted that he wanted the medical professionals and attorneys invited to the "open house" to think that Ortho was affiliated with DOL.

48. Ms. Ditto told Defendant Perez that DOL's presence would only confuse the issue, at which point Defendant Perez simply laughed and openly acknowledged that that was exactly what he intended to happen.

49. DOL has now been contacted by a number of irate attorneys and paralegals who thought that they got a doctor referral from the Map (*i.e.*, the DOL directory) only to find out that they got the listing from an Ortho directory and not from the Map. *See*, Exhibit 2.

50. DOL has also been contacted by a number of confused medical professionals who were actually confused by Defendants.

COUNT ONE
Federal Trademark Infringement
15 U.S.C. § 1114 and 1117

51. DOL hereby realleges and restates the allegations contained in the foregoing paragraphs, as if fully set forth herein.

52. DOL owns the DOL Marks, and its certificate of registration is *prima facie* evidence of ownership of the DOL Marks, the validity of the registration, and DOL's exclusive right to use the DOL Marks in commerce with respect to its services.

53. Ortho is, and has been, using the confusingly similar Infringing Mark without license or authorization from DOL in connection with Ortho's services.

54. Defendants have infringed the DOL Marks in connection with the advertising, promotion, and/or sales of services closely related to the services of DOL without the consent of DOL in a manner which is likely to cause, and actually has caused, confusion, mistake, or to deceive as to source or origin among purchasers or users of those services. These activities are likely to lead to confusion in the marketplace and, in fact, have caused such confusion.

55. DOL's goodwill in its DOL Marks will be irreparably harmed if Defendants continue their actions.

56. Defendants' actions constitute trademark infringement under 15 U.S.C. § 1114.

57. Defendants' actions are, and have been, in willful, deliberate, and intentional disregard to DOL's rights.

58. This case is exceptional under Section 35(a) of the Lanham Act, 15 U.S.C. § 1117(a), entitling DOL to enhanced damages and attorney's fees.

59. DOL has been damaged by the actions of Defendants in an amount to be determined at trial. If the acts of Defendants are allowed to continue, DOL will continue to suffer irreparable injury for which it has no adequate remedy at law.

COUNT TWO

Federal Unfair Competition

60. DOL hereby realleges and restates the allegations contained in the foregoing paragraphs, as if fully set forth herein.

61. Defendants' use of the DOL Marks in connection with the advertising, promotion and/or sale of services closely related to the services of DOL without the consent of DOL is likely to cause confusion, mistake, or to deceive as to the origin or source of Defendants' services among purchasers or users of those services, and, in fact, Defendants have intentionally, and admittedly, caused such confusion, mistake, and deception.

62. Defendants' use of the Infringing Mark infringes DOL's rights in its federally registered mark and common law trademarks.

63. Defendants have made, and continue to make, false representations, false descriptions, and false designations of origin in violation of 15 U.S.C. § 1125(a), including, but not limited to, Defendants' commercial use of the Infringing Mark which fully incorporates the DOL Marks.

64. Defendants' activities have caused and, unless enjoined by this Court, will continue to cause a likelihood of confusion and deception to members of the trade and public and, additionally, injury to DOL's goodwill and reputation, for which DOL has no adequate remedy at law.

65. Defendants' actions demonstrate an intentional, willful, and malicious intent to trade on the goodwill associated with DOL to the great and irreparable injury of DOL.

66. Defendants' conduct has caused, and is likely to continue causing, substantial injury to the public and to DOL, whereby DOL is entitled to injunctive relief and to recover actual damages, profits, enhanced profits and damages, costs, and reasonable attorneys' fees under 15 U.S.C. §§ 1125(a), 1116, and 1117.

67. DOL has been damaged by the actions of Defendants in an amount to be determined at trial.

68. If the acts of Defendants are allowed to continue, DOL will continue to suffer irreparable injury for which it has no adequate remedy at law.

COUNT THREE
Federal Trademark Dilution

69. DOL hereby realleges and restates the allegations contained in the foregoing paragraphs, as if fully set forth herein.

70. The DOL Marks are distinctive, strong, and famous and became so before Defendants' activities described in this Complaint.

71. Defendants' are making unlicensed and unauthorized commercial use in commerce of the DOL Marks, and Defendants' activities have caused and are causing dilution of the distinctive quality of the DOL Marks.

72. Defendants' conduct erodes the public's exclusive identification of the DOL Marks with DOL and tarnishes and degrades the positive associations and prestigious connotations of the DOL Marks.

73. Defendants willfully intended to trade on DOL's reputation and to cause dilution of the DOL Marks.

74. DOL is, therefore, entitled to injunctive relief and to recover actual damages, profits, enhanced profits and damages, costs, and reasonable attorneys' fees under 15 U.S.C. §§ 1125(c), 1116, and 1117.

COUNT FOUR
Common Law Trademark Infringement and Unfair Competition

75. DOL hereby realleges and restates the allegations contained in the foregoing paragraphs, as if fully set forth herein.

76. Defendants' acts constitute common law trademark infringement and unfair competition, and have created and will continue to create a likelihood of confusion to the irreparable injury of DOL unless restrained by this Court. DOL has no adequate remedy at law for this injury.

77. On information and belief, Defendants acted with full knowledge of DOL's use of and statutory and common law rights to, the DOL Marks and without regard to the likelihood of confusion to customers, potential customers, and the public created by those activities.

78. Defendants' actions demonstrate a willful intent to trade on the goodwill associated with the DOL Marks to the great and irreparable injury of DOL.

79. As a result of Defendants' acts, DOL has been damaged in an amount not as yet determined or ascertainable. At a minimum, however, DOL is entitled to injunctive relief, to an award of all of Defendants' profits, and to actual damages.

80. In light of the willful and intentional use of the DOL Marks, and the need to deter Defendants from similar conduct, DOL additionally is entitled to punitive damages.

COUNT FIVE
State Trademark Dilution and Injury to Business

81. DOL hereby realleges and restates the allegations contained in the foregoing paragraphs, as if fully set forth herein.

82. DOL has extensively and continuously promoted and used the DOL Marks throughout California and elsewhere in the United States, and the DOL Marks have thereby become distinctive, well-known symbols of DOL's goods and services.

83. Defendants' unauthorized use of the confusingly similar Infringing Mark, which fully incorporates the totality of the DOL Marks dilutes and is likely to dilute the distinctiveness of the DOL Marks by eroding the public's exclusive identification of these marks with DOL and by tarnishing and degrading the positive associations and prestigious connotations of the DOL Marks.

84. Defendants are causing and will continue to cause irreparable injury to DOL's goodwill and business reputation, and dilution of the distinctiveness of value of the DOL Marks in violation of California Bus. & Prof. Code § 14330.

85. DOL is, therefore, entitled to injunctive relief, damages and costs as well as enhanced damages and reasonable attorneys' fees.

WHEREFORE, DOL prays that the Court enter an Order:

A. Preliminarily and permanently enjoining and restraining Ortho and its directors, officers, agents, servants, employees, subsidiaries, affiliates, and all persons in active concert or participation with, through, or under Ortho, including Perez:

1. From using in any way the DOL Marks, or any other marks, words or names confusingly similar to DOL's Marks in conjunction with any of Defendants' services;

2. Using any trademark, service mark, name, logo, design, domain name, or source designation of any kind on or in connection with Defendants' goods or services that is a copy, reproduction, colorable imitation, or simulation of or confusingly similar to, or in any way similar to the trademarks, service marks, names, or logos of DOL;

3. From committing any acts of unfair competition and from creating a false designation of origin or a false description or representation with respect to the DOL Marks;

4. From using in any manner, advertisements, brochures, websites, marketing materials or other promotional materials related to Defendants' services bearing the words "Doctors on Liens" or any other mark, word, domain name, combination (*i.e.*, "lien docs" or "lien doctors"), or name confusingly similar to the DOL Marks or any colorable imitation thereof, including, but not limited to "docsonliens.com" and/or "orthodocsonliens.com", or any other reference to "doctorsonliens" or "docsonliens", whether or not such name includes or references any particular medical specialties;

5. From making any statements on promotional materials or advertising for Defendants' services which are false or misleading as to source or origin, or which reference "doctors on liens", "docs on liens", or any other medical professional or medical field as being "on liens" or referring to "lien docs" or "lien doctors";

6. From committing any acts of deceptive or unlawful trade practices calculated to cause members of the trade or purchasing public to believe that Defendants' services are the services of DOL or

sponsored or associated with, or related to, or connected with, or in some way endorsed or promoted by DOL under the supervision or control of DOL; and/or

7. Using as an electronic address any URL designation or domain name that is confusingly similar to, or dilutive of, any of the trademarks, service marks, names, or logos of DOL including, but not limited to "http://www.orthodocsonliens.com";

B. Requiring that Defendants deliver up to DOL any and all advertising, brochures, marketing or promotional materials, which in any way use or make reference to the DOL Marks in connection with Defendants' services;

C. Requiring Defendants to transfer to DOL all ownership of any domain name that includes any reference to "doctors on liens" or "orthopaedic doctors on liens" or "docs on liens" or any colorable imitation thereof, including, but not limited to "orthodocsonliens.com";

D. Awarding to DOL all damages recoverable by law under 15 U.S.C. § 1117, California law, and the common law;

E. Ordering an accounting to determine Defendants' profits;

F. Awarding to DOL its reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1117(a) and (b), and/or California law, as allowed by law;

G. Awarding to DOL prejudgment interest dating from service of this Complaint on any profits, damages, and attorneys' fees awarded as provided for by 15 U.S.C. § 1117;

H. Awarding DOL enhanced damages based on Defendants' willful and intentional use of the DOL Marks, and to deter such conduct; and

I. Awarding DOL such other relief as the Court may deem just and appropriate.

A JURY TRIAL IS DEMANDED.

Respectfully submitted,

Dated: December 26, 2012

By: s/ Jeremy P. Smith
Jeremy P. Smith

Respectfully submitted,

Dated: December 26, 2012

By: s/ Sanford J. Asman
Sanford J. Asman

Attorneys for Plaintiff
Doctors on Liens, Inc.

EXHIBIT LIST

Exhibit No.	Description
1	Secretary of State listing showing Orthopaedic Doctors On Liens, Inc. ("Ortho") to be "suspended"
2	(A portion of) Doctors On Liens, Inc. ("DOL") "Map" of listed medical professionals
3	U.S. Reg. No. 2,920,498, registered on January 25, 2005 ("the '498 Registration")
4	Ortho's website at http://www.orthodocsonliens.com
5	Ortho's infringing uses of DOL Marks in media and print

EXHIBIT 1

Business Entity Detail

Data is updated weekly and is current as of Friday, December 21, 2012. It is not a complete or certified record of the entity.

Entity Name:	ORTHOPAEDIC DOCTORS ON LIENS, INC.
Entity Number:	C2562778
Date Filed:	10/01/2003
Status:	SUSPENDED
Jurisdiction:	CALIFORNIA
Entity Address:	2772 GATEWAY ROAD
Entity City, State, Zip:	CARLSBAD CA 92009
Agent for Service of Process:	CHRIS CROWELL
Agent Address:	2772 GATEWAY ROAD
Agent City, State, Zip:	CARLSBAD CA 92009

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code **section 2114** for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to **Name Availability**.
- For information on ordering certificates, copies of documents and/or status reports or to request a more extensive search, refer to **Information Requests**.
- For help with searching an entity name, refer to **Search Tips**.
- For descriptions of the various fields and status types, refer to **Field Descriptions and Status Definitions**.

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EXHIBIT 2

WINTER 2013

DoctorsonLiens INC

(855) DOC-LIENS
(855) 362-5436
www.doctorsonliens.com

ZONE I : VENTURA COUNTY, SAN FERNANDO VALLEY, SAN GABRIEL VALLEY & KERN COUNTY

1. **Alhambra: Dr. Arshaid/Alhambra Health Clinic**
P.I./ W.C. Liens • D.C., QME, M.D. & Ortho Available
(626) 458-4271
1041 S. Garfield Ave., #208, Alhambra, CA 91801
M-F 9-7

2. **Arcadia/Monrovia: SMART Spine Institute & Surgery Centers**
P.I./W.C. Liens • M.D., D.C., QME, Podiatrist, Acupuncture, Ortho & Neuro Available
(626) 445-0326
131 E. Huntington Dr., Arcadia, CA 91006
M-Th 9-6, F 8-5, Sat. by Appointment

3. **Azusa/Glendora: Hess Rehabilitation Centers**
P.I./W.C. Liens • D.C., Acupuncture, M.D. Avail.
(888) 427-2225
625 E. Arrow Highway #1, Glendora, CA 91740
M-F 8-7, Sat. 9-12

4. **Bakersfield: Advanced Wellness Center Christopher Berry, D.C.**
P.I. Liens • M.D., OB/GYN, Acupuncture, Ortho Avail.
(661) 410-9355
8501 Brimhall Rd., Building 300
Bakersfield, CA 93312
M-F 9-6

5. **Burbank: Focus Chiropractic Center**
P.I./W.C. Liens • M.D., D.C., QME, Acupuncture
(818) 842-7700
916 West Burbank Blvd., Suite L, Burbank, CA 91506
M-F 9:30-7, Sat. by Appt.

6. **Canoga Park: Kenneth Winer, D.C.**
P.I. Liens • M.D. & Ortho Available
(818) 888-7227
7127 Owensmouth Ave., Canoga Park, CA 91303
M-Th 9-6, F 9-12

7. **Glendale: Pacific Chiro Rehab Clinic**
P.I. /W.C. Liens • D.C., QME, M.D. Available
(818) 240-6500
540 N. Central Ave., #208, Glendale, CA 91203
M-F 10-7

8. **Granada Hills: Infinity Health Clinics**
P.I./W.C. Liens • M.D., D.C., QME, Ortho Available
(818) 363-8450
17547 Chatsworth St., #1/2 Granada Hills, CA 91344
M-F 9-6, Sat. by Appt.

9. **Highland Park/Eagle Rock: Michelle Santoro, D.C.**
P.I. Liens • Acupuncture, M.D. & Ortho Available
(323) 687-3222
2769 W. Broadway, Eagle Rock, CA 90041
M-F 9-7

10. **NEW/LANCASTER: MMI MEDICAL GROUP (Formerly BKP Chiropractic)**
P.I./W.C. Liens • Ortho, Pain Mgmt., Internal Medicine, Podiatry, Accupuncture, D.C.
(661) 945-1899
412 W. Avenue J, Ste. F, Lancaster, CA 93534
M-F 8:30-5:30

11. **Mojave/Rosamond: Allied Chiropractic**
P.I./W.C. Liens • Ortho, Neuro, Pain Mgmt., D.C., QME
(661) 945-4441
1314 W. Avenue J, Lancaster, CA 93534
MWF 9-6, T Th 8-4

12. **Newhall/Santa Clarita/Stevenson Ranch: Finneran Chiropractic**
P.I./W.C. Liens • D.C., M.D. & Ortho Available
(661) 259-1935
24502 ½ Lyons Ave., Newhall, CA 91321
M-F 9-6

13. **North Hollwood/Studio City: Victor Helo, D.C.**
P.I. Liens • M.D. & Ortho Available
(818) 487-9100
12103 Ventura Place, Studio City, CA 91604
M-F 9-6, Sat. 8:30-1

14. **Northridge: Steinberg Chiropractic**
P.I. Liens • Acupuncture, M.D. & Ortho Avail.
(818) 886-3531
9036 Reseda Blvd., #204, Northridge, CA 91324
M-F 8:30-7

15. **Oxnard: Vineyard Chiropractic**
P.I. Liens • D.C., M.D. & Ortho Available
(805) 485-8181
2577 E. Vineyard Ave., Oxnard, CA 93036
M-F 9-7

16. **Pacoima/Sylmar: Pacoima Health Clinic**
P.I./W.C. Liens • D.C., Ortho, Podiatry & M.D. Avail.
(818) 834-6966
13066 Van Nuys Blvd., Pacoima, CA 91331
M-F 9-6, Sat. by Appt.

17. **Palmdale: Randy L. Rein, D.C.**
P.I. Liens • M.D. & Ortho Available
(661) 265-0505
2720 E. Palmdale Blvd., #123, Palmdale, CA 93550
MWF 9-6, Th 2-6, Sat by Appt.

18. **NEW/PANORAMA CITY: HESS REHABILITATION CENTERS (NEW ADDRESS)**
P.I./W.C. Liens • D.C., Acupuncture
(888) 427-2225
14421 Chase St., Suite B, Panorama City, CA 91402
M-F 8-7, Sat. 9-12

19. **Pasadena: Pasadena Chiropractic Medical Group**
P.I./W.C. Liens • M.D., Physical Medicine, Board Certified Orthopedic Surgeon, D.C., QME
(626) 744-9462
960 E. Green St., #208, Pasadena, CA 91106
M-F 8-6

20. **Reseda: Michelle Santoro, D.C.**
P.I. Liens • Acupuncture, M.D. & Ortho Available
(818) 345-3900
19231 Victory Blvd., # 255, Reseda, CA 91335
M-F 9-7

21. **NEW/SAN FERNANDO: MAYA CHIROPRACTIC CENTER**
P.I. Liens • D.C., M.D., Ortho & Neuro Available
(818) 898-1000
321 N. Maclay Ave., Unit C, San Fernando, CA 91340
M-F 9-6, Sat. by Appt.

22. **Santa Barbara: Bruce Akoni Yong, D.C.**
P.I. Liens • M.D. & Ortho Available
(805) 252-8341
351 S. Hitchcock Way, #B-120
Santa Barbara, CA 93105
M-F 9-6, Sat. by Appt.

23. **Simi Valley: Phillip Lavine, D.C.**
P.I. Liens • QME, M.D. & Ortho Available
(805) 581-8053
1716 Erringer Rd., #100, Simi Valley, CA 93065
M-F 8:30-6:30

24. **Thousand Oaks: Kevin Kelly, D.C.**
P.I. Liens • Ortho & Neuro Available
(805) 496-6104
223 E. Thousand Oaks Blvd., #420
Thousand Oaks, CA 91360
M-F 9-7

25. **Valencia/Santa Clarita: BKP Chiropractic & Rehabilitation**
P.I./W.C. Liens • D.C., QME, M.D. & Ortho Avail.
(661) 259-2211
23360 W. Valencia Blvd., #R, Valencia, CA 91355
MW 9-6, T Th 9-7, F 9-5

26. **Van Nuys: Brigitte Rozenberg, D.C.**
P.I./W.C. Liens • Massage, R.P.T., Neuro & Orthopedic Surgeon Available
(818) 901-1505
15710 1/2 Vanowen St., Van Nuys, CA 91406
M-F 9-7, Sat. 9-3

27. **Ventura: Harer & Mortensen Chiropractic, Inc.**
P.I./W.C. Liens • D.C., QME, IME, M.D. & Ortho Avail.
(805) 650-5929
4517 Market Street, #1, Ventura, CA 93003
MTWF 8-6

28. **NEW/WOODLAND HILLS: NATURE'S REMEDY CLINIC**
P.I./W.C. Liens • D.C., M.D. & Ortho Avail.
(818) 992-5252
20969 Ventura Blvd., Ste. 23,
Woodland Hills, CA 91364
M-F 9-6

ZONE 2: LOS ANGELES COUNTY

29. **Bellflower: Andrew Enos, D.C.**
P.I./W.C. Liens • QME, Ortho Available
(562) 925-2699
9739 Flower St., Bellflower, CA 90706
M-F 9-6:30, Sat. by Appt.

30. **Carson: Ginoza & Nakano Chiropractic**
P.I./W.C. Liens • D.C., QME, M.D. & Ortho Avail.
(310) 518-7011
460 E. Carson Plaza Dr., #116, Carson, CA 90746
MWF 10-7, T Th 2-7, Sat. by Appt.

31. **Cerritos: Masler Chiropractic**
P.I. Liens • D.C., M.D. Available
(562) 924-3347
13344 South Street, Cerritos, CA 90703
MWF 9-7, T 2-7, Sat. 9-12

32. **Compton/Lynwood: Hess Rehabilitation Centers**
P.I./W.C. Liens • D.C., Acupuncture, M.D. & Ortho Avail.
(888) 427-2225
306 W. Compton Blvd., #103, Compton, CA 90220
M-F 8-7, Sat. 9-12

EXHIBIT 3

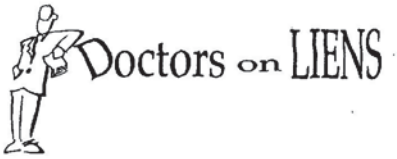
Int. Cl.: 35

Prior U.S. Cls.: 100, 101 and 102

United States Patent and Trademark Office

Reg. No. 2,920,496
Registered Jan. 25, 2005

SERVICE MARK
PRINCIPAL REGISTER



DOCTORS ON LIENS, INC. (CALIFORNIA CORPORATION)

15233 VENTURA BLVD., SUITE 1004

SHERMAN OAKS, CA 91403

FOR: MARKETING AND ADVERTISING SERVICES IN THE NATURE OF DOCTOR REFERRALS, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 8-9-1995; IN COMMERCE 8-9-1995.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE DOCTORS, APART FROM THE MARK AS SHOWN.

THE MARK CONSISTS OF LINE DRAWN CHARACTER OF A DOCTOR LEANING AGAINST AND TILTING THE LETTER "D" IN THE PHRASE "DOCTORS ON LIENS".

SER. NO. 76-553,952, FILED 10-8-2003.

CHRIS WELLS, EXAMINING ATTORNEY

Side - 1

NOTICE OF ACKNOWLEDGEMENT
OF §15 DECLARATION
MAILING DATE: Jun 1, 2011

The affidavit of incontestability filed in connection with the registration identified below meets the requirements of Section 15 of the Trademark Act, 15 U.S.C. §1065. The affidavit is acknowledged.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov/.

REG NUMBER:	**2920496**
MARK:	**DOCTORS ON LIENS AND DESIGN**
OWNER:	**Doctors on Liens, Inc.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS
MAIL
U.S POSTAGE
PAID

Sanford J. Asman
LAW OFFICES OF Sanford J. Asman
570 Vinington Court
Atlanta, GA 30350

Side - 1

NOTICE OF ACCEPTANCE OF §8 DECLARATION
MAILING DATE: May 18, 2011

The declaration filed in connection with the registration identified below meets the requirements of Section 8 of the Trademark Act, 15 U.S.C. §1058. The declaration is accepted and the registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER:	**2920496**
MARK:	**DOCTORS ON LIENS AND DESIGN**
OWNER:	**Doctors on Liens, Inc.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE PAID

Sanford J. Asman
LAW OFFICES OF Sanford J. Asman
570 Vinington Court
Atlanta, GA 30350

EXHIBIT 4

Welcome to Orthopaedic Doctors on Liens

Orthopaedic Doctors on Liens, Inc. (ODOL) specializes in making available to Personal Injury Attorneys and their clients; surgeons, specialists, hospitals and ancillary providers all on a lien or letter of protection. When you turn to ODOL you will greatly increase the health care options for your client as well as strengthening your case.

ODOL is dedicated to making available the most qualified, caring physicians to treat personal injury victims. Our comprehensive resources allow us to provide service in multiple states. Regardless of where the client is or what injury needs treating, give Orthopaedic Doctors On Liens a call for doctors and options available to you.

3 Share 4 Like 2

Contact Us

To receive more information about Orthopaedic Doctors on Liens, please complete the form below.

First Name (required) | Last Name (required)
Office Name | Email (required)
Address, line 1 | Address, line 2
City | State | ZIP | Phone Number (required)
Your Message (required)

Send

ORTHOPAEDIC DOCTORS ON LIENS, INC. (800) 314-9088

ORTHOPAEDIC DOCTORS ON LIENS, INC. info@orthodocsonliens.com

If You've Been Injured...

Most people involved in an auto accident or other traumatic incident causing injury to them have never had such a thing happen to them before. You're hurt and don't know where to go. You need medical treatment and are concerned about paying expensive doctor bills. If you don't have health care insurance, finding a doctor can be daunting. These are the most common complaints we hear and also the exact reason accident victims call us.

Fortunately you've found Orthopaedic Doctors on Liens. ODOL specializes in facilitating medical treatment of injuries that were caused by an accident. We make available numerous medical specialties and locations in multiple states. We will work with you and your attorney. You will have access to the right specialty for your injury whether it is an orthopaedist, neurosurgeon, plastic surgeon or pain management physician. Also available are diagnostics, physical therapy and surgery. These doctors will not seek payment at the time of service; we will work with your attorney for payment through your case.

If you've been hurt in an accident and don't know where to turn for assistance, please call for doctor availability in your area. Let us make your road to recovery a smooth one.

0 Share Like 2

Contact Us

To receive more information about Orthopaedic Doctors on Liens, please complete the form below.

First Name (required) Last Name (required)

Office Name
Email (required)
Address, line 1
Address, line 2
City
State
ZIP
Phone Number (required)
Your Message (required)

Send

ORTHOPAEDIC
DOCTORS ON LIENS. INC.

(800) 314-9088

ORTHOPAEDIC
DOCTORS ON LIENS. INC.

info@orthodocsonliens.com

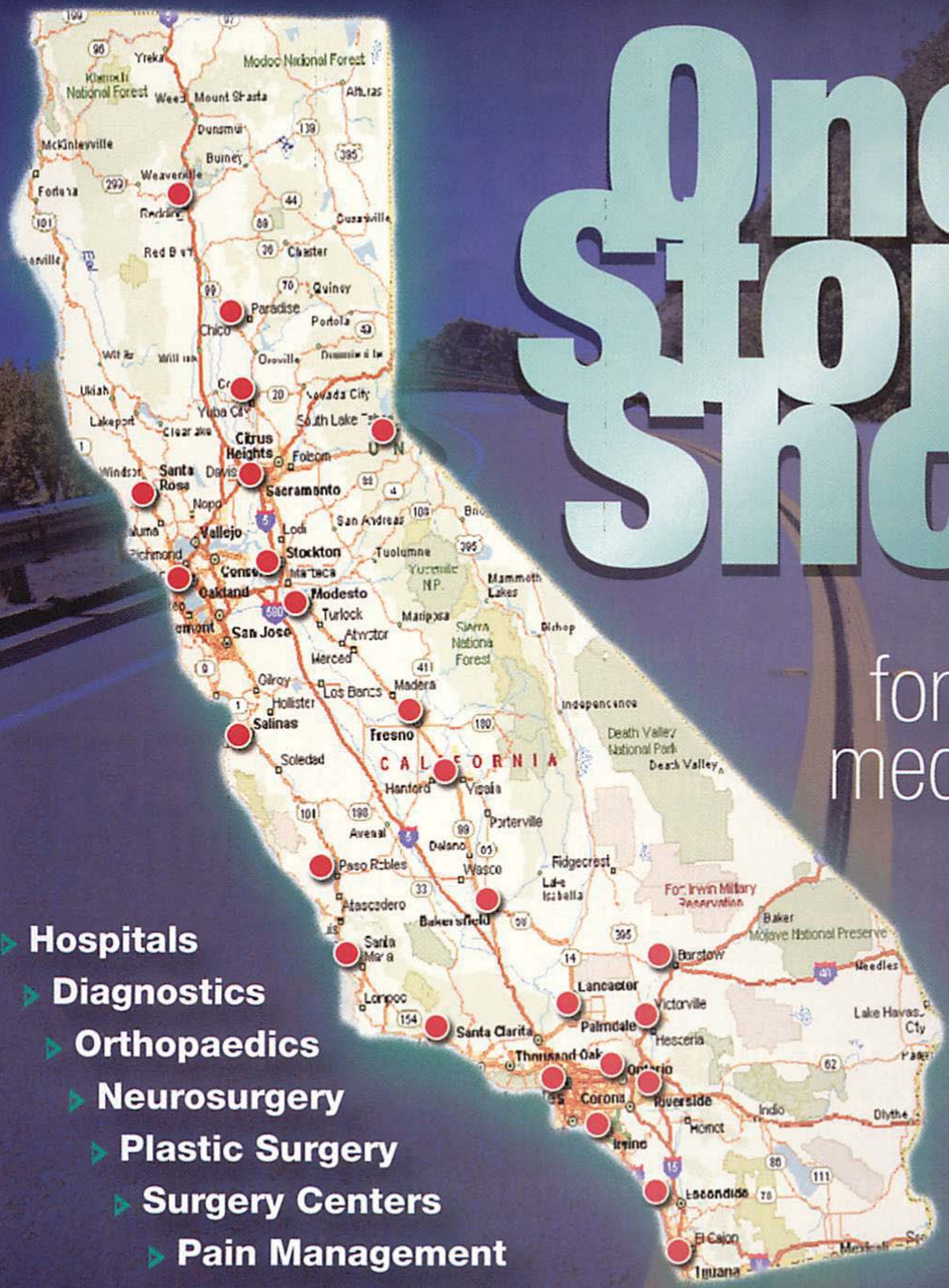
(800) 314-9088 | © 2011 Orthopaedic Doctors on Liens, Inc. | Web Development by Netwalker Internet Services

EXHIBIT 5

From Redding to San Diego, we're your

One-Stop-Shop

for all your medical lien needs.



- Hospitals
- Diagnostics
- Orthopaedics
- Neurosurgery
- Plastic Surgery
- Surgery Centers
- Pain Management

ORTHOPAEDIC
DOCTORS ON LIENS, INC.

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www.OrthoDocsOnLiens.com | (800) 314-9088

Holiday Party!

Join
Orthopaedic Doctors On Liens
and
Regional Pain Treatment Medical Center
for a Holiday Party!

Wednesday, December 12, 2012 5:00PM

We are a busy office and welcome building new referral relationships. Join us for food, drinks, a great time and a brief conversation with Dr. Liceaga about recent advancements in pain management and surgery. Dr. Liceaga has dedicated his life to implementing new innovative treatment techniques.

Al Liceaga, M.D.

Receive MCLE Credits!

Does not qualify for MCLE requirements for Legal Ethics, Elimination of Bias and Substance Abuse/Mental Illness

Save Date

Date: December 12, 2012
Time: 5:00 - 7:00 P.M.
Place: Regional Pain Treatment Medical Center
295 Imperial Highway
Fullerton, CA 92835

RSVP to (800) 314-9088

ORTHOPAEDIC DOCTORS ON LIENS, INC.

Regional Pain Treatment Medical Center RPTMC

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 Dolly Gee and the assigned discovery Magistrate Judge is Alicia G. Rosenberg.

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

CV12- 10988 DMG (AGRx)

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

DOCTORS ON LIENS, INC., a California corporation

Plaintiff(s)

v.

ORTHOPAEDIC DOCTORS ON LIENS, INC., a (suspended) California corporation and CHARLES PEREZ, an individual

Defendant(s)

Civil Action No. CV12-10988-DMG (AGRx)

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:

Law Offices of Jeremy P. Smith
22287 Mulholland Hwy., Suite 348
Calabasas, CA 91302

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.

CLERK OF COURT

Date: DEC 27 2012

MARILYN DAVIS

Signature of Clerk or Deputy Clerk

CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)
Doctors on Liens, Inc.
15233 Ventura Blvd., Suite 1004
Sherman Oaks, CA 91403

DEFENDANTS
Orthopaedic Doctors on Liens, Inc.
Charles Perez
2772 Gateway Road, Carlsbad, CA 92009

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
Law Offices of Jeremy P. Smith
22287 Mulholland Hwy., Suite 348
Calabasas, CA 91302

Attorneys (If Known)

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	☐ 1	☐ 1	Incorporated or Principal Place of Business in this State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 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: $** unknown

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.)
15 U.S.C. §1051, et seq., Trademark Infringement, Unfair Competition, Trademark Dilution

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

OTHER STATUTES
☐ 400 State Reapportionment
☐ 410 Antitrust
☐ 430 Banks and Banking
☐ 450 Commerce/ICC Rates/etc.
☐ 460 Deportation
☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 480 Consumer Credit
☐ 490 Cable/Sat TV
☐ 810 Selective Service
☐ 850 Securities/Commodities/ Exchange
☐ 875 Customer Challenge 12 USC 3410
☐ 890 Other Statutory Actions
☐ 891 Agricultural Act
☐ 892 Economic Stabilization Act
☐ 893 Environmental Matters
☐ 894 Energy Allocation Act
☐ 895 Freedom of Info. Act
☐ 900 Appeal of Fee Determination Under Equal Access to Justice
☐ 950 Constitutionality of State Statutes

CONTRACT
☐ 110 Insurance
☐ 120 Marine
☐ 130 Miller Act
☐ 140 Negotiable Instrument
☐ 150 Recovery of Overpayment & Enforcement of Judgment
☐ 151 Medicare Act
☐ 152 Recovery of Defaulted Student Loan (Excl. Veterans)
☐ 153 Recovery of Overpayment of Veteran's Benefits
☐ 160 Stockholders' Suits
☐ 190 Other Contract
☐ 195 Contract Product Liability
☐ 196 Franchise

REAL PROPERTY
☐ 210 Land Condemnation
☐ 220 Foreclosure
☐ 230 Rent Lease & Ejectment
☐ 240 Torts to Land
☐ 245 Tort Product Liability
☐ 290 All Other Real Property

TORTS PERSONAL INJURY
☐ 310 Airplane
☐ 315 Airplane Product Liability
☐ 320 Assault, Libel & Slander
☐ 330 Fed. Employers' Liability
☐ 340 Marine
☐ 345 Marine Product Liability
☐ 350 Motor Vehicle
☐ 355 Motor Vehicle Product Liability
☐ 360 Other Personal Injury
☐ 362 Personal Injury-Med Malpractice
☐ 365 Personal Injury-Product Liability
☐ 368 Asbestos Personal Injury Product Liability

IMMIGRATION
☐ 462 Naturalization Application
☐ 463 Habeas Corpus-Alien Detainee
☐ 465 Other Immigration Actions

TORTS PERSONAL PROPERTY
☐ 370 Other Fraud
☐ 371 Truth in Lending
☐ 380 Other Personal Property Damage
☐ 385 Property Damage Product Liability

BANKRUPTCY
☐ 422 Appeal 28 USC 158
☐ 423 Withdrawal 28 USC 157

CIVIL RIGHTS
☐ 441 Voting
☐ 442 Employment
☐ 443 Housing/Accommodations
☐ 444 Welfare
☐ 445 American with Disabilities - Employment
☐ 446 American with Disabilities - Other
☐ 440 Other Civil Rights

PRISONER PETITIONS
☐ 510 Motions to Vacate Sentence Habeas Corpus
☐ 530 General
☐ 535 Death Penalty
☐ 540 Mandamus/ Other
☐ 550 Civil Rights
☐ 555 Prison Condition

FORFEITURE / PENALTY
☐ 610 Agriculture
☐ 620 Other Food & Drug
☐ 625 Drug Related Seizure of Property 21 USC 881
☐ 630 Liquor Laws
☐ 640 R.R. & Truck
☐ 650 Airline Regs
☐ 660 Occupational Safety /Health
☐ 690 Other

LABOR
☐ 710 Fair Labor Standards Act
☐ 720 Labor/Mgmt. Relations
☐ 730 Labor/Mgmt. Reporting & Disclosure Act
☐ 740 Railway Labor Act
☐ 790 Other Labor Litigation
☐ 791 Empl. Ret. Inc. Security Act

PROPERTY RIGHTS
☐ 820 Copyrights
☐ 830 Patent
☑ 840 Trademark

SOCIAL SECURITY
☐ 861 HIA (1395ff)
☐ 862 Black Lung (923)
☐ 863 DIWC/DIWW (405(g))
☐ 864 SSID Title XVI
☐ 865 RSI (405(g))

FEDERAL TAX SUITS
☐ 870 Taxes (U.S. Plaintiff or Defendant)
☐ 871 IRS-Third Party 26 USC 7609

CV12-10988

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

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 County	

(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	San Diego County

(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): _____ **Date** December 27, 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))