

ORIGINAL

Larry Klayman
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Plaintiff in Pro Se

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LARRY KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH,

Defendant.

CV14-1602 ABC (AS₄)

Case No. :

[Pending in the Southern District of
Florida, Case 13-20610-CIV]

NOTICE OF MOTION AND
EXPEDITED MOTION TO
COMPEL COMPLIANCE WITH
SUBPOENA TO ORLY TAITZ

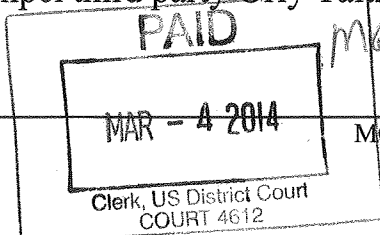
Hearing Date: 4-⁷~~10~~-2014

Time: 10:00 AM

Judge: ABC

Courtroom: 680

NOTICE is hereby given of the filing of this motion by Plaintiff Larry
Klayman ("Plaintiff"), pursuant to Rule 45, Fed.R.Civ.P. This motion seeks to
compel third party Orly Taitz ("Taitz") to appear for deposition and produce



1
MOTION TO COMPEL COMPLIANCE

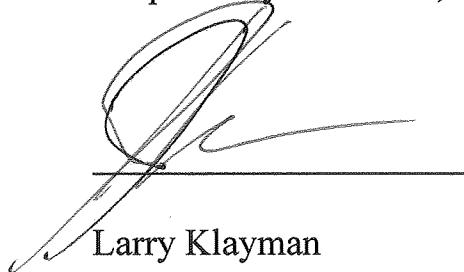
1 documents requested in the Subpoena Duces Tecum issued on January 15, 2014.
2 Plaintiff respectfully requests that this motion be transferred to the Southern
3 District of Florida pursuant to Fed.R.Civ.P Rule 45. Plaintiff further respectfully
4 requests that Tatiz be ordered to sit for a deposition and to produce the requested
5 documents within five days from the Court's order. Plaintiff also requests that he
6 be awarded his reasonable attorneys' fees and costs incurred in connection with
7 this Motion in the amount of at least \$2,000.00.
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9

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11 This motion is made following the conference of counsel pursuant to Local
12 Rule 7-3. The parties were unable to reach agreement on the issues raised in the
13 instant motion.
14

15 **Plaintiff respectfully requests expedited handling of this motion.**
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17

18 Dated: March 4, 2014
19

20 Respectfully submitted,
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23 _____
24 Larry Klayman

25 Plaintiff in Pro Se
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MEMORANDUM IN SUPPORT OF EXPEDITED MOTION TO COMPEL**I. HISTORY**

This action arises from a series of events that took place after Plaintiff left Judicial Watch, a non-profit organization he had founded, and subsequently gained notoriety and national recognition for his high profile lawsuits through his non-profit organization, Freedom Watch. See Exhibit A - Complaint ("Compl.") ¶ 1. Affidavit of Larry Klayman; Exhibit F. Consequently, Defendants, all agents of Judicial Watch, acting in concert with each other, had set out to willfully and maliciously harm Plaintiff and his reputation, as well as harm his successful law practice. Compl. ¶ 15. Specifically, Defendants Thomas Fitton ("Fitton"), Paul Orfanedes ("Orfanedes"), Constance Ruffley ("Ruffley"), and Christopher Farrell ("Farrell"), directly and through other agents of Judicial Watch, defamed, disparaged, and denigrated Plaintiff in order to discredit him and irreparably damage Plaintiff's reputation. In addition, the Defendants tortuously interfered with Plaintiff's legal practice in this district and caused him severe emotional distress. Compl. ¶ 36.

Ruffley, an Office Administrator and Representative of Judicial Watch, engaged in a conversation and published with "Dr. Orly Taitz, Esquire" ("Taitz") in or around February 22, 2012, while attending an event. Compl. ¶ 12-13 Taitz is widely known as the founder of the "Defend Our Freedom Foundation" and

1 maintains the popular self-proclaimed website, "The World's Leading Obama
2 Eligibility Website." Compl. ¶ 13. Klayman had made it known that he had
3 intended to file lawsuits in Florida challenging the eligibility of Barack Obama to
4 run for re-election. Compl. ¶ 14. During Ruffley's conversation with Taitz,
5 Ruffley intentionally conveyed a false and defamatory statement about Plaintiff,
6 alleging that Plaintiff had been "convicted" of a crime for not paying child
7 support.¹ Compl. ¶ 15.

8
9 Specifically, as pled in the Complaint, this false statement was conveyed to
10 Taitz with the intention and expectation that Taitz would further spread the
11 malicious remark by publishing it on her popular and widely viewed website.
12 Compl. ¶ 13. Moreover, as evidenced by the facts and circumstances, Defendants
13 not only anticipated that Taitz would publish the false statement on her popular
14 website, but that said publication would perpetuate further dissemination and
15 publication of the false statement in hopes that it would be widely circulated in this
16 district, nationally, and worldwide. Compl. ¶ 13.

17
18 Defendants' ploy was successful as the false and malicious statement was, in
19 fact, published on Taitz' website and was, as predicted, further disseminated,
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26 ¹ Plaintiff had a valid defense for not paying the child support since his obligation
27 was nullified under Virginia law as a result of extreme circumstances, in which he
28 was completely and unlawfully denied access to his children. *Hartman v. Hartman*,
33 Vir. Cir. 373. Moreover, Plaintiff has never been convicted of any crime in any
circumstance.

1 nationally and worldwide, directly reaching and effecting Plaintiff in this district.

2 Compl. ¶ 13. More specifically, as a direct result of Defendants' intentional

3
4 conduct, the false statements were disseminated in and circulated in this district

5 where Plaintiff resides and conducts business as a lawyer licensed to practice in

6
7 Florida, thus, intentionally harming Plaintiff personally and professionally and his

8 standing in his community. Compl. ¶ 20.

9
10 As a result of the false statement, accusing Plaintiff of committing a crime, and the

11 resulting reputational harm, Defendants' not only subjected Plaintiff to ridicule,

12 humiliation, and embarrassment, but also caused Plaintiff severe emotional

13
14 distress, which effected Plaintiff both professionally and personally.² Compl. ¶

15 20. In fact, Defendants' acts directly impacted Plaintiff's business in the legal

16
17 profession. Specifically, Defendants intentionally and unjustifiably interfered with

18 a contractual relationship between Plaintiff and a potential client by spreading per

19
20 se defamatory statements about Plaintiff, damaging his reputation, and

21 consequently, preventing Plaintiff from engaging in legal representation. Compl.

22 ¶ 29.

23 24 II. ARGUMENT

25 Rule 45(c)(2)(B)(i), Fed.R.Civ.P., provides that the party serving a subpoena

26
27 ² Defendants' conduct constitutes defamation by per se, as the false statement
28 provides the reader the false and misleading impression that Plaintiff committed
and/or has been convicted of a crime.

1 may move the issuing court for an order compelling production or inspection at
2 any time on notice to the commanded person. Plaintiff has complied with all
3 procedural and substantive requirements for this Motion to be granted.
4

5 Orly Taitz is a witness to the libelous statements of Defendant Judicial
6 Watch. Plaintiff made several attempts to serve Taitz beginning with the week of
7 January 6, 2014. Plaintiff was told that Taitz was out of town, and it was apparent
8 that Taitz was likely evading service of process. On January 20, 2014 Taitz was
9 personally served at her business address with a Subpoena Duces Tecum requiring
10 Taitz to appear and testify at a deposition scheduled for January 30, 2014. See
11 Exhibit B. A proof of service was completed and is attached as Exhibit C. Taitz
12 has stated that she is refusing to comply with the Subpoena and will not be
13 appearing for the deposition and has not filed an objection to the Subpoena with
14 this Court or within the Southern District of Florida. Further, it has been fourteen
15 (14) days since Taitz has been served with the subpoena and Taitz has not filed an
16 objection to the Subpoena with this Court and has thus waived all objections to the
17 subpoena.
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23 **III. THIS MOTION SHOULD RESPECTFULLY BE TRANSFERRED**
24 **TO THE SOUTHERN DISTRICT OF FLORIDA**
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26 FRCP Rule 45 allows for this subpoena-related motion to be transferred.
27 Specifically, Rule 45(f) provides:
28

Transferring a Subpoena-Related Motion. When the court where

1 compliance is required did not issue the subpoena, it may transfer a
2 motion under this rule to the issuing court if the person subject to the
3 subpoena consents or if the court finds exceptional circumstances.
4 Then, if the attorney for a person subject to a subpoena is authorized
5 to practice in the court where the motion was made, the attorney may
6 file papers and appear on the motion as an officer of the issuing court.
7 To enforce its order, the issuing court may transfer the order to the
8 court where the motion was made.

9 FRCP 45(f); *See also FTC v. A+ Fin. Ctr., LLC*, 2013 U.S. Dist. LEXIS 172472
10 (S.D. Ohio Dec. 5, 2013)("Rule 45, as amended, provides an explicit mechanism
11 for transferring such motions to other courts when warranted by the
12 circumstances.")

13 This motion arises out of a lawsuit pending before the U.S. District Court for
14 the Southern District of Florida. Plaintiff is a citizen of Florida, and the Defendant
15 has an office located in Florida and has already hired Florida counsel who is
16 representing it in these proceedings. In addition, there is currently a hearing
17 scheduled in front of Magistrate Andrea M. Simonton on March 5, 2014 within the
18 Southern District of Florida to hear discovery related matters. In order to save
19 judicial resources, and for the convenience of the parties, this matter should
20 respectfully be transferred back to the Southern District of Florida.

21 IV. CONCLUSION


22 Plaintiff respectfully requests that this Court expeditiously transfer this
23 motion to the Southern District of Florida. Plaintiff further respectfully requests

1 that this Court issue an order compelling Taitz to sit for a deposition and to
2 produce all documents requested in the subpoena within five days and to pay the
3 reasonable costs and attorneys' fees incurred by Plaintiff in preparing, filing and
4 arguing this Motion.
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8 Dated: March 4, 2014

9 Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Larry Klayman', is written over a horizontal line.

Larry Klayman

Defendant in Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 4, 2014, filed the foregoing document with the Clerk of the Court using. I also certify that the foregoing document is being served this date on all counsel of record or pro se parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.


LARRY KLAYMAN

Plaintiff Pro Se

SERVICE LIST

Douglas James Kress
Schwed Kahle & Jenks, P.A.
11410 North Jog Road
Suite 100
Palm Beach Gardens, FL 33418
561-694-0070
Fax: 561-694-0057
Email: dkress@schwedpa.com

VIA EMAIL AND U.S. MAIL

Orly Taitz
29839 Santa Margarita Pkwy,
Rancho Santa Margarita, CA 92688

VIA EMAIL AND U.S. MAIL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Audrey B. Collins and the assigned Magistrate Judge is Alka Sagar.

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

CV14-1602-ABC(ASx)

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.

Clerk, U. S. District Court

March 4, 2014

Date

By C. Sawyer
Deputy Clerk

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 Street, G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐ Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

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

I. (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) Larry Klayman	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Judicial Watch
(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Larry klayman 2520 Coral Way, Suite 2027 Miami, FL 33145 Phone: (310)595-0800	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Douglas Kress 11410 N. Jog Road Suite 100 Palm Beach Gardens, FL. 33418 Phone: (561) 694-0070

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input checked="" type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border: none;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td></td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 2</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF		<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input checked="" type="checkbox"/> 2	<input checked="" 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
Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF																				
	<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input checked="" type="checkbox"/> 2	<input checked="" 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.)

<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
--	--	---	--	---	---

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$**

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.)

28 U.S. Code § 1332 - Diversity

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

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS		<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	TORTS	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	PERSONAL INJURY	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	LABOR	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 790 Other Labor Litigation	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number:

CV-71 (11/13)

CIVIL COVER SHEET

CV14-1602

Page 1 of 3

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

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column C
- ☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the SOUTHERN DIVISION.
Enter "Southern" in response to Question D, below.

If none applies, answer question C2 to the right. ➡

C.2. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column D
- ☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the EASTERN DIVISION.
Enter "Eastern" in response to Question D, below.

If none applies, go to the box below. ↓

Your case will initially be assigned to the WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: ➡	

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETIX(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): _____

IX(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.

X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT): _____

DATE: 03/03/14

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. 405 (g))