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Attorneys for Plaintiff,

TACORI ENTERPRISES

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CV12-04323 PA(VBK)

TACORI ENTERPRISES,

Plaintiff,

vs.

**OVERSEE.NET, OVERSEE
DOMAIN MANAGEMENT, LLC,
and NAMEKING.COM INC.,**

Defendant.

Case No.

**COMPLAINT FOR
CYBERSQUATTING**

DEMAND FOR TRIAL BY JURY

Plaintiff, TACORI ENTERPRISES ("Tacori"), by and through its attorneys, Christie, Parker & Hale, LLP, files its complaint against Defendants, OVERSEE.NET, OVERSEE DOMAIN MANAGEMENT, LLC and NAMEKING.COM INC. (collectively, "Oversee"), for injunctive relief and damages as follows:

Tacori alleges as follows, upon actual knowledge with respect to itself and its own acts, and on information and belief as to all other matters.

FILED

12 MAY 18 PM 1:12

CLERK OF COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

Subject Matter Jurisdiction and Venue

1. Except for allegations based on personal knowledge, such as allegations involving Tacori's business and corporate identity, the allegations in this Complaint are based on information and belief.

2. This is an action for cybersquatting under 15 U.S.C. § 1125(d). This Court has subject matter jurisdiction over the claims pursuant to 15 U.S.C. § 1121, and 28 U.S.C. §§ 1331 and 1338.

3. Venue is proper in this judicial district as to Oversee pursuant to 28 U.S.C. § 1391(b), 28 U.S.C. § 1391(c) and/or 28 U.S.C. § 1391(d).

Parties and Personal Jurisdiction

4. Tacori is a California corporation with its principal place of business at 1736 Gardena Avenue, Glendale, California.

5. Defendant Oversee.Net operates one of the largest internet traffic monetization networks in the world and conducts its business at 515 S. Flower Street, Suite 4400, Los Angeles, California.

6. Defendant Oversee Domain Management, LLC is a Delaware corporation licensed to do business in California and conducts its business at 515 S. Flower Street, Suite 4400, Los Angeles, California.

7. Defendant NameKing.com, Inc. is a Delaware corporation licensed to do business in California and conducts its business at 515 S. Flower Street, Suite 4400, Los Angeles, California. NameKing.com, Inc. is also a registrar of Internet domain names accredited by the Internet Corporation for Assigned Names and Numbers ("ICANN"), a California corporation.

8. Defendants Oversee.Net, Oversee Domain Management, LLC and NameKing.com, Inc. (collectively "Oversee") are the agents, servants, employees, partners, alter egos, subsidiaries or joint venturers of each other and that the acts of each of the Defendants were in the scope of such relationship.

1 9. In doing the acts or failing to act as alleged in this Complaint, each
2 of the Defendants acted with the knowledge, permission and the consent of each
3 of the other Defendants.

4 10. Each of the Defendants aided and abetted each of the other
5 Defendants in the acts or omissions alleged in this Complaint.

6 11. This Court has personal jurisdiction over Overseer because Overseer
7 conducts systematic and continuous business within the Central District of
8 California related to the unlawful activities at issue in this Complaint.

9 **Tacori's Business**

10 12. For over 35 years, Tacori has been an innovator in the design,
11 creation, and marketing of fine jewelry. Tacori designs its own jewelry and has
12 created exclusive collections from only top quality platinum and 18 or 22 karat
13 gold.

14 13. Tacori owns United States Trademark Registration No. 3,071,071 for
15 its word mark TACORI which it uses in connection with all jewelry items.
16 Tacori first used the TACORI mark in 1989. The TACORI mark is now
17 incontestable pursuant to 15 U.S.C. § 1065. A copy of the registration certificate
18 for this registration is attached to this Complaint as Exhibit 1.

19 14. Tacori also owns United States Trademark Registration No.
20 3,315,049 for its word mark TACORI and design which it uses in connection with
21 all jewelry items, including rings, bracelets, earrings, wedding bands. Tacori first
22 used the TACORI mark and design in 1990. A copy of the registration certificate
23 for this registration is attached to this Complaint as Exhibit 2.

24 15. The TACORI marks and design (collectively, the "Tacori
25 Trademarks") are valid and enforceable. The Tacori Trademarks are widely
26 known and recognized among jewelers and consumers throughout the world.

27 16. The Tacori Trademarks are unique and distinctive and, as such,
28 designate a single source of origin.

1 17. As a result of Tacori's extensive and exclusive use, the Tacori
2 Trademarks have developed extensive goodwill in the market and are extremely
3 valuable to Tacori. Tacori expends substantial effort and expense to protect the
4 Tacori Trademarks and their distinctiveness in the marketplace.

5 18. Tacori has made and continues to make a substantial investment of
6 time, effort, and expense in the design, manufacturing, and marketing of its
7 jewelry under the Tacori Trademarks. For example, Tacori's custom designed
8 platinum and diamond wedding bands and the Tacori Trademarks were featured
9 on the Today Show and received the popular vote from over 59,000 viewers
10 choosing the wedding bands for a winning couple. Tacori's custom designs and
11 the Tacori Trademarks have also been featured on Extra, and various seasons of
12 The Bachelorette and The Bachelor.

13 19. Tacori advertises its jewelry designs and the Tacori Trademarks in
14 national publications, such as Cosmopolitan, Elegant Bride, Elle, InStyle, InStyle-
15 Wedding, Marie Claire, Martha Stewart Wedding, Modern Bride, Robb Report,
16 Town & Country, Vogue, and W. Furthermore, Tacori advertises its products,
17 and the Tacori Trademarks in trade publications and over the World Wide Web
18 through its website www.tacori.com.

19 20. Tacori's jewelry, bearing the Tacori Trademarks, have been sold to
20 retail stores throughout the United States. These retail stores display and offer for
21 sale Tacori's jewelry bearing the Tacori Trademarks to the general public.

22 21. The Tacori Trademarks have had outstanding commercial success.
23 As a result, jewelers and the public recognize the Tacori Trademarks as
24 designating an exclusive source, thereby creating a goodwill which inures to
25 Tacori's benefit.

26 22. In 1998, Tacori expanded its retailing strategy by launching an
27 Internet website using the domain name [tacori.com](http://www.tacori.com) and operating a website
28 available at <http://www.tacori.com> and at <http://tacori.com>.

28. Oversee's activities are entirely consistent with other cybersquatters' activities. Oversee has registered and used many domain names that are confusingly similar to famous trademarks, including the Tacori Trademarks, in order to attract consumers who are attempting to reach the trademark owner's webpage. Some of Oversee's domain names include a trademark combined with a descriptive word or phrase associated with the trademark (e.g., the trademark TACORI and the descriptive phrase "rings" which was combined in the domain name tacorirings.com). Oversee also registered common misspelling or mistyping of trademarks, again, to attract consumers who are attempting to reach the trademark owner's webpage (e.g., the misspelling of Tacori registered as taccori.com).

29. Oversee hosts webpages at the registered domain names which contain advertisements. When the advertisements are clicked by the consumers Oversee gets paid by Internet advertising companies.

**Oversee's Registration, Use, and Trafficking In Domain Names
That Are Confusingly Similar to the Tacori Trademarks**

30. TACORI has not authorized Oversee to use the Tacori Trademarks Marks in any way.

31. Oversee has registered, used or trafficked in, at least 6 domain names which are confusingly similar to the Tacori Trademarks, including:

taccori.com
tacorri.com
tacoriiv.com
tacorirings.com
tacoti.com
tracori.com

(collectively, the "Infringing Domain Names").

32. Each of the Infringing Domain Names is confusingly similar to at least one of the Tacori Trademarks.

1 33. Oversee was the registrant for the Infringing Domain Names.
2 Printouts of historic WHOIS data for the Infringing Domain Names showing
3 Oversee as the Registrant are attached to this Complaint as Exhibit 4.

4 34. Oversee used many of the Infringing Domain Names to divert for
5 commercial gain Internet users searching for the Tacori Trademarks.

6 35. Oversee operated websites at many of the Infringing Domain Names
7 which displayed HTML links featuring goods or services that are directly
8 competitive with those sold or provided in connection with the Tacori
9 Trademarks. Screenshots of some of the websites hosted at most of the Infringing
10 Domain Names are attached to this Complaint as Exhibit 5.

11 36. When Internet users clicked on one or more of the displayed HTML
12 links on the websites at many of the Infringing Domain Names, Oversee received
13 payments from one or more advertisers, search engines, or affiliate programs.

14 **Harm to Tacori and the General Public**

15 37. Oversee's unauthorized registration and use of the Infringing
16 Domain Names create a likelihood of confusion as to the source, sponsorship,
17 affiliation, or endorsement of the Infringing Domain Names, and is likely to
18 falsely suggest a sponsorship, connection, license, or association of Oversee, and
19 the Infringing Domain Names, with Tacori.

20 38. Oversee's activities have irreparably harmed and, if not enjoined,
21 will continue to irreparably harm Tacori and its long-used and federally registered
22 trademarks.

23 39. Oversee's activities have irreparably harmed, and if not enjoined,
24 will continue to irreparably harm the general public who has an inherent interest
25 in being free from confusion, mistake, and deception.

FIRST CAUSE OF ACTION

[Cybersquatting on the Tacori Trademarks

Under 15 U.S.C. § 1125(d)]

40. Tacori realleges and incorporates by reference each of the paragraphs above as though fully set forth here.

41. Oversee registered, trafficked in or used the Infringing Domain Names.

42. The Tacori Trademarks were distinctive and federally registered at the United States Patent and Trademark Office at the time Oversee registered and used the Infringing Domain Names.

43. The Infringing Domain Names are confusingly similar to the Tacori Trademarks.

44. Oversee registered, trafficked in, or used the Infringing Domain Names in bad faith and with a bad faith intent to profit from the Tacori Trademarks.

45. Oversee does not have any intellectual property rights or any other rights in the Tacori Trademarks.

46. None of the Infringing Domain Names consist of the legal name of Oversee, nor a name that is otherwise commonly used to identify Oversee.

47. Oversee has not made any prior use of any of the Infringing Domain Names in connection with the bona fide offering of any goods or services.

48. Oversee has not made any bona fide fair use of the Tacori Trademarks on a website accessible under any of the Infringing Domain Names.

49. Oversee registered and used the Infringing Domain Names to divert consumers from Tacori's websites to websites accessible under the Infringing Domain Names for Oversee's commercial gain by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of these websites.

1 50. Oversee provided material and misleading false contact information
2 when applying for the registration of the Infringing Domain Names.

3 51. Oversee intentionally failed to maintain accurate contact information
4 in connection with the registration of the Infringing Domain Names.

5 52. Oversee has engaged in a pattern of providing material and
6 misleading false contact information when applying for the registration of domain
7 names.

8 53. Oversee has acquired multiple domain names which Defendant
9 knows are identical or confusingly similar to marks of others that were distinctive
10 at the time of registration of such domain names, or dilutive of famous marks of
11 others that were famous at the time of registration of such domain names.

12 54. The Tacori Trademarks are famous within the meaning of
13 15 U.S.C. § 1125(c).

14 55. The Infringing Domain Names are identical or confusingly similar to
15 the Tacori Trademarks.

16 56. Oversee's registration, use, or trafficking in the Infringing Domain
17 Names constitutes cybersquatting in violation of 15 U.S.C. § 1125(d), entitling
18 Tacori to relief.

19 57. Oversee engaged in these activities with a bad faith intent to profit
20 from the registration or maintenance of the Infringing Domain Names.

21 58. By reason of Oversee's acts, Tacori's remedy at law is not adequate
22 to compensate them for the injuries inflicted by Oversee. Accordingly, Tacori is
23 entitled to preliminary and permanent injunctive relief pursuant to
24 15 U.S.C. § 1116.

25 59. By reason of Oversee's acts, Tacori is entitled to recover Oversee's
26 profits, actual damages and the costs of the action, or statutory damages under
27 15 U.S.C. § 1117, on election by Tacori, in an amount of \$100,000.00 per domain
28 name infringement.

- 1 accurate contact information, including Overseer's full legal
- 2 name, as the registrant;
- 3 e) Cybersquatting against Tacori or any violation of Tacori's
- 4 trademark rights; and
- 5 f) Assisting, aiding or abetting any other person or business
- 6 entity in engaging in or performing any of the activities
- 7 referred to in subparagraphs 2(a) through 2(e) above;
- 8 3. That Overseer be ordered to engage in corrective advertising to the
- 9 extent necessary to correct any consumer confusion or
- 10 misperceptions resulting from Overseer's unlawful acts complained
- 11 of above;
- 12 4. That Overseer be ordered to account to Tacori for, and disgorge, all
- 13 profits they have derived by reason of the unlawful acts complained
- 14 of above;
- 15 5. That Overseer be ordered to pay damages, and that those damages be
- 16 trebled, under 15 U.S.C. § 1117;
- 17 6. That Overseer be ordered to pay statutory damages under
- 18 15 U.S.C. § 1117(d), on election by Tacori, in an amount of
- 19 \$100,000.00 per domain name infringement;
- 20 7. That Overseer be ordered to pay Tacori's reasonable attorney fees,
- 21 prejudgment interest, and costs of this action under
- 22 15 U.S.C. § 1117;
- 23 8. That Overseer be ordered to file with the Court and serve upon Tacori
- 24 a written report under oath setting forth in detail the manner and
- 25 form in which Overseer has complied with the injunction and
- 26 judgment within 30 days after the service of the injunction and
- 27 judgment upon Overseer; and
- 28

1 9. That Tacori be awarded such other relief as may be appropriate.
2

3 DATED: May 17, 2012

Respectfully submitted,

4 CHRISTIE, PARKER & HALE, LLP

5
6 By  _____

7 Howard A. Kroll

8 Attorneys for Plaintiff,
9 Tacori Enterprises
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DEMAND FOR TRIAL BY JURY

Plaintiff, TACORI ENTERPRISES, hereby demands a trial by jury to decide all issues so triable in this case.

DATED: May 17, 2012

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By


Howard A. Kroll
David J. Steele

Attorneys for Plaintiff,
Tacori Enterprises

SCL PAS1172028.1-*05/17/12 12:11 PM

EXHIBIT 1

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

Reg. No. 3,071,071

United States Patent and Trademark Office

Registered Mar. 21, 2006

TRADEMARK
PRINCIPAL REGISTER

TACORI

TACORI ENTERPRISES (CALIFORNIA COR-
PORATION)
1736 GARDENA AVENUE
GLENDALE, CA 91204

THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.

FOR: JEWELRY, IN CLASS 14 (U.S. CLS. 2, 27, 28
AND 50).

SER. NO. 78-600,488, FILED 4-1-2005.

FIRST USE 1-30-1989; IN COMMERCE 1-30-1989.

CYNTHIA SLOAN, EXAMINING ATTORNEY

EXHIBIT 2

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

United States Patent and Trademark Office

Reg. No. 3,315,049

Registered Oct. 23, 2007

**TRADEMARK
PRINCIPAL REGISTER**



TACORI ENTERPRISES (CALIFORNIA CORPORATION)
607 S. HILL ST.
SUITE 414
LOS ANGELES, CA 90014

FIRST USE 3-1-1990; IN COMMERCE 3-1-1990.

OWNER OF U.S. REG. NO. 1,588,750.

SER. NO. 76-458,620, FILED 10-16-2002.

FOR: JEWELRY, NAMELY, RINGS, BRACELETS,
EARRINGS AND WEDDING BANDS, IN CLASS 14
(U.S. CLS. 2, 27, 28 AND 50).

ALICE SUE CARRUTHERS, EXAMINING ATTORNEY

EXHIBIT 3

TACORI Engagement Wedding Rings Fine Jewelry Diamonds Where to Buy About Tacori Experiences Favorites Search

18K 925



Kiss Me.
Tempt Me.

View the collection now

Engagement Jewelry

Fashion Jewelry

TRY IT ON SITE MAP FAQ NEWS - EVENTS AUTHENTICITY REGISTRATION AGES



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http://www.tacori.com/fine-jewelry/collections/18K925

TACORI

Engagement Wedding Rings Fine Jewelry Diamonds Where to Buy About Tacori Experiences Favorites Search



3/6 Map X

Bound by Passion
View the collection now

Engagement Jewelry

Fashion Jewelry

TRAVEL ON SITE MAP - MAKE NEWS - EVENTS - AGENT - TRAVEL RESERVATION -



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< 4/6 Prev >



*Pour on the
Glamour*
View the collection now >

18K
925

EXHIBIT
PAGE

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19

Tacori Designer Diamond Engagement Rings, Wedding Rings, and Fine Jewelry - Windows Internet Explorer

http://www.tacori.com/

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Adorn Her
Like a Queen
View the collection now

Engagement Jewelry

Fashion Jewelry

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Internet

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EXHIBIT PAGE 3 20

TACORI

Engagement Wedding Rings Fine Jewelry Diamonds Where to Buy About Tacori Experiences Favorites Search

< See More >

Love,
Sweet Love
Love the collection more



Engagement Jewelry

Fashion Jewelry

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EXHIBIT 4

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Whois History for Taccori.com on 2012-02-28

Enter a domain name to get its history

taccori.com

[b SñvYxv](#)**Domain:** [taccori.com](#) 0 z krlbK bwp**Cache Date:** 534503505;**Registrar:** NAMEKING.COM, INC.**Server:** z krlbqdp hnljlfrc**Created:** 5336045048**Updated:** 534404405<**Expires:** 5345045048

Reverse Whois: Fdñ#xq#dq#hp dl#dgguhv#z h#ixqg#l#wk#z krlb#uhfrug
 w#vhh#z klfk#rwkhu#grp dlqv#kch#uhj bwdq#l#dvvrflidhg#z lk=
[dep hC xvhwbbcro dlp dgdihp hgwfrp](#) [hxC qdp hnljlfrc](#) [dexvhC qdp hnljlfrc](#)

Domain Name: taccori.com**Registrant****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.com**Address:** 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071**Country:** US**Phone:** 1.2132653191**Admin Contact****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.com**Address:** 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071**Country:** US**Phone:** 1.2132653191**Billing Contact****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.comEXHIBIT 4
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Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191
Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191
Creation Date: 12/15/03
Expiration Date: 12/15/12
Domain Status: ACTIVE
Domain Servers
ns1.dsredirection.com
ns2.dsredirection.com
Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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Whois History for Tacorri.com on 2012-03-08

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Enter a domain name to get its history

tacorri.com

[Get History](#)[p Subvixv](#)Domain: [tacorri.com](#) 0 3 kxwK hngul

Cache Date: 534503603;

Registrar: NAMEKING.COM, INC.

Server: z kxwKdp hngj ifrp

Created: 5337036045

Updated: 5345034036

Expires: 5346036045

Reverse Whois: Fdn#rq#dq#hp dldgguhvv#z h#ixqg#lq#k#z kxw#uhfrug

w#vhh#z klfk#xwku#grp dlqv#kh#uhj lwdq#l#dvvr fldhg#z lk=

[dap hC xwhwherp ddp dadihp hngifrp](#) [hxC ddp hngj ifrp](#) [dexvhC ddp hngj ifrp](#)

Domain Name: tacorri.com

Registrant

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Admin Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Billing Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

EXHIBIT 4
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Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street
Suite 4400

City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Creation Date: 03/12/04
Expiration Date: 03/12/13
Domain Status: ACTIVE

Domain Servers

ns1.dsredirection.com

ns2.dsredirection.com

Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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Whois History for Tacoriiv.com on 2012-02-12

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Enter a domain name to get its history

tacoriiv.com

[Get History](#)[b Stvixv](#)**Domain:** [tacoriiv.com](#) 0 2 kxv#k b w u i**Cache Date:** 5345035045**Registrar:** NAMEKING.COM, INC.**Server:** z kxvMqdp hnqjifrp**Created:** 534403503;**Updated:** 534503503<**Expires:** 534603503;**Reverse Whois:** Fdtn#rg#dq#hp d b dgguhv#z h#ixqg#ig#wk#z kxv#uhfrug

w#vhh#z kLk#zwhu#grp dLqv#kch#uhj b w d q w b#dvvz f d w b g#z wk=

[dgp bC r v h u h e r p d r o d d i h o h o w i f r p](#) [b i r C q d p h n q j i f r p](#) [d e x v h C q d p h n q j i f r p](#)

Domain Name: tacoriiv.com

Registrant

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Admin Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Billing Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

EXHIBIT 4
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Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191
Creation Date: 02/08/11
Expiration Date: 02/08/12
Domain Status: EXPIRY-HOLD

Domain Servers

ns1.dsredirection.com

ns2.dsredirection.com

Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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tacorirings.com

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Whois History for Tacorirings.com on 2012-04-08

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Enter a domain name to get its history

tacorirings.com

Get History

[b ShvYrxv](#)Domain: [tacorirings.com](#) 0 [z kxYKJwcul](#)

Cache Date: 534503703;

Registrar: NAMEKING.COM, INC.

Server: z kxYqdp hnlgjifrp

Created: 5337034049

Updated: 534404505<

Expires: 5346034049

Reverse Whois: FdFn#rq#dq#bp dL#dgguhv#z h#irxqg#lq#kL#z kxL#uhfrug

w#vhh#z kLk#xwkh#grp dLq#kxh#uhjLwldq#L#dvzflb#hg#z lk=

[dqp hC xYhwhxrp dLp dqiLp hqWfrp](#) [hirc dqp hnL#frp](#) [dexvhC dqp hnL#lfrp](#)

Domain Name: tacorirings.com

Registrant

Name: Admin -

Organization: Oversea Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Admin Contact

Name: Admin -

Organization: Oversea Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Billing Contact

Name: Admin -

Organization: Oversea Domain Management, LLC

Email: admin@overseedomainmanagement.com

EXHIBIT 4
PAGE 28

Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191
Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191
Creation Date: 01/16/04
Expiration Date: 01/16/13
Domain Status: ACTIVE
Domain Servers
ns1.dsredirection.com
ns2.dsredirection.com
Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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EXHIBIT 4
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Whois History for Tacoti.com on 2012-02-24

[Tweet](#)[Like](#)

Enter a domain name to get its history

[Get History](#)[b.Sthvkrxy](#)**Domain:** [tacoti.com](#) 0 2 krlw#k hnwj**Cache Date:** 5345035057**Registrar:** NAMEKING.COM, INC.**Server:** z krlwqdp hnljifrp**Created:** 5339044037**Updated:** 5344043064**Expires:** 5345044037**Reverse Whois:** Fdfn#rq#dq#hp dldgguhvv#z h#ixqg#lq#wk#z krlw#uhfrug

w#vhh#z klfk#zku#grp dlqv#kh#uhj lwdq#l#dvvz fldwhg#z lk=

[dgp qC rvhwhhgrp dlp dadihp hnwjfrp](#) [Bxrc qdp hnljifrp](#) [dexvhG qdp hnljifrp](#)**Domain Name:** tacoti.com**Registrant****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.com**Address:** 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071**Country:** US**Phone:** 1.2132653191**Admin Contact****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.com**Address:** 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071**Country:** US**Phone:** 1.2132653191**Billing Contact****Name:** Admin -**Organization:** Oversee Domain Management, LLC**Email:** admin@overseedomainmanagement.comEXHIBIT 4
PAGE 30

Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Creation Date: 11/04/06
Expiration Date: 11/04/12
Domain Status: ACTIVE

Domain Servers

ns1.dsredirection.com

ns2.dsredirection.com

Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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[Overview](#) [Whois Lookup](#) [Reverse Whois](#) [Whois History](#) [Hosting History](#) [Screenshot History](#) [Name Server Report](#) [Reverse IP](#) [DNS Tools](#)

Whois History for Tracori.com on 2012-03-20

Enter a domain name to get its history

tracori.com

[b Stihvkrxy](#)**Domain:** [tracori.com](#) 0 [2 krlvKkbnul](#)**Cache Date:** 5345036053**Registrar:** NAMEKING.COM, INC.**Server:** z krlvlgdp hnlgjlfrp**Created:** 533603;055**Updated:** 534403;05**Expires:** 534503;055

Reverse Whois: F dfn#rq#dq#hp dldggguhvz h#ixqg#lq#wk#z krlv#uhfrug
 w#vhh#z klfk#rwhu#grp dlqv#wh#uhj#wdq#l#dvrfldhg#z lk=
[dqp kC xvhwhhrrp dhp dadihp hawfrp](#) [hxc adp hnlgjlfrp](#) [dexvhC adp hnlgjlfrp](#)

Domain Name: tracori.com

Registrant

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Admin Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

Address: 515 S. Flower Street

Suite 4400

City, Province, Post Code: Los Angeles, California, 90071

Country: US

Phone: 1.2132653191

Billing Contact

Name: Admin -

Organization: Oversee Domain Management, LLC

Email: admin@overseedomainmanagement.com

EXHIBIT 4
PAGE 32

Address: 515 S. Flower Street
Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Tech Contact

Name: Admin -
Organization: Oversee Domain Management, LLC
Email: admin@overseedomainmanagement.com
Address: 515 S. Flower Street

Suite 4400
City, Province, Post Code: Los Angeles, California, 90071
Country: US
Phone: 1.2132653191

Creation Date: 08/22/03
Expiration Date: 08/22/12
Domain Status: ACTIVE

Domain Servers

ns1.dsredirection.com

ns2.dsredirection.com

Registration Provided By: NAMEKING INC.
Contact: info@nameking.com
Abuse Desk Email Address: abuse@nameking.com

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EXHIBIT 5

Taccori.com

What you need, when you need it

Related Searches

Engagement Rings

Tacori

Best Diamond Engagement Rings

Diamond Engagement Rings

Buy Engagement Ring

Pave Wedding Rings

White Gold Engagement Rings

Tiffany Diamond Rings

Blue Sapphire Diamond Rings

Cash For Diamond Rings

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DrFlormanOrtho.com

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www.generales.com

ENGAGEMENT RINGS

Find a ring as perfect as she is at Blue Nile
www.BlueNile.com

MOTHER'S DAY RINGS

Put her kid's birthstone in a Ring A Mother' Daughter Ring
Gemvara.com

ZALES ONLINE

Elegant jewelry to fit your budget. Free Shipping & Returns
Zales.com

Related Searches: Diamond Wedding Rings UK | Platinum Rings | Celtic Wedding Rings Sets | Bridal Engagement Rings | High End Diamond Rings | Engagement Rings for Women

Legal Policies

EXHIBIT 5
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Tacorri.com

What you need, when you need it

Related Searches

Tacori Rings

Diamond Engagement Rings

Engagement Rings

Vintage Engagement Rings

Live Wedding Bands

Tiffany Diamond Rings

Wedding Ring Sets

Wedding Rings Wedding Bands

Two Tone Diamond Wedding Band

Best Diamond Engagement Rings

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INVISALIGN FROM \$2999

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DrFlormanOrtho.com

ENGAGEMENT RINGS

Find a ring as perfect as she is at Blue Nile
www.BlueNile.com

SELL YOUR DIAMONDS TODAY

We Pay Premium Prices for Large Diamonds
www.newport-jewelers.net

BUY VARNA RINGS LOCAL

We Carry Popular Brands & Designers Merchandise
www.generales.com

LOW-COST ENGAGEMENT

World's Largest Selection of Lab- Created Diamonds
DiamondNexus.com/EngagementRings

Related Searches: Mens Diamond Band | Diamond Wedding Rings UK | Celtic Titanium Wedding Bands | Four
Greek Key Wedding Ring | Emerald Cut Diamond | Cheap Diamond Wedding Sets

Legal Policies

EXHIBIT 5
PAGE 35

Tacorirings.com

What you need, when you need it

Related Searches

Engagement Rings

Tacori Rings

Tacori CZ Rings

Diamond Ring

Diamonds Engagement Rings

Pave Wedding Rings

White Gold Engagement Rings

Cash For Diamond Rings

Blue Sapphire Diamond Rings

Platinum Rings

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Do You Have the Stones to Propose? Corr
www.RobbinsBrothers.com

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Great Selection of beautiful rings Up to 70%
www.bridalrings.com

ENGAGEMENT RINGS

Find a ring as perfect as she is at Blue Nile
www.BlueNile.com

DIAMOND JEWELRY

Shop Gordon's fine jewelry today! Free Shi
GordonsJewelers.com

WEDDING DIAMOND RINGS

40-80% Off Women's Wedding Rings Certi
www.BeverlyDiamonds.com/Wedding

Related Searches: [Diamond Wedding Rings UK](#) | [Celtic Wedding Rings Sets](#) | [Wedding Rings Wedding Bands](#) |
[Cheap Titanium Wedding Rings](#) | [Engagement Rings for Women](#) | [Roberto Coin Engagement Rings](#)

[Legal Policies](#)

Tacoti.com

What you need, when you need it

Related Searches

Wedding Rings

Pave Wedding Rings

Diamonds Engagement Rings

White Gold Engagement Rings

Pink Sapphire Rings

Blue Sapphire Diamond Rings

Rings Princess

Platinum Rings

Gold And Ruby Rings

Diamond Wedding Rings UK

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Put her kid's birthstone in a Ring A Mother'
Gemvara.com

SAVE \$1000S ON INVISALIC

Lowest Price due to a University Study Sut
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Related Searches: Semi Mounts for Rings | Build Your Own Rings | High End Diamond Rings | Deals on Engag
Rings | Anniversary Rings | 4 Carat Wedding Rings

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EXHIBIT 5
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Tracori.com

What you need, when you need it

Related Searches

[Hatton Garden Engagement Rings](#)

[Buy Engagement Ring](#)

[Pave Wedding Rings](#)

[White Gold Engagement Rings](#)

[Tiffany Diamond Rings](#)

[Best Diamond Engagement Rings](#)

[Blue Sapphire Diamond Rings](#)

[Cash For Diamond Rings](#)

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FIND YOUR ENGAGEMENT

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ENGAGEMENT RINGS

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ZALES: THE DIAMOND STO

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Zales.com

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[Legal Policies](#)

**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 Percy Anderson and the assigned discovery Magistrate Judge is Victor B. Kenton.

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

CV12- 4323 PA (VBKx)

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.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TACORI ENTERPRISES

CASE NUMBER

PLAINTIFF(S)

CV12-04323

PA(VBKx)

v.

OVERSEE.NET, OVERSEE DOMAIN MANAGEMENT,
LLC, and NAMEKING.COM INC.**SUMMONS**

DEFENDANT(S).

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, Howard A. Kroll, whose address is Christie, Parker & Hale, LLP, 655 N. Central Ave., Ste 2300, Glendale, CA 91203. 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.

MAY 18 2012

Clerk, U.S. District Court

Dated: _____

By: _____

JULIE PRADO SEAL

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 ☐)

TACORI ENTERPRISES

DEFENDANTS

OVERSEE.NET, OVERSEE DOMAIN MANAGEMENT, LLC, and NAMEKING.COM INC.

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

Howard A. Kroll, CA Bar No. 100981
 howard.kroll@cph.com
 Christie, Parker & Hale, LLP
 655 N. Central Ave., Suite 2300
 Glendale, California 91203
 Phone: 626-795-9900; Fax: 626-577-8800

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 | <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:** \$ according to proof

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. Section 1125(d).

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

OTHER STATUTES	CONTRACT	TORTS PERSONAL INJURY	TORTS PERSONAL PROPERTY	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 530 General	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	PROPERTY RIGHTS
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input checked="" type="checkbox"/> 840 Trademark
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 630 Liquor Laws	SOCIAL SECURITY
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 891 Agricultural Act	REAL PROPERTY	IMMIGRATION	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 465 Other Immigration Actions			<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land				FEDERAL TAX SUITS
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number: CV12-04323

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): CV05-1388 RSWL (MCx) ; CV06-0380 CJC (RNBx)

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☒ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☒ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

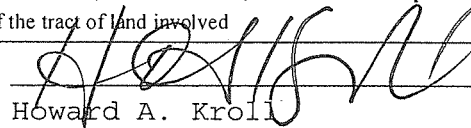
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):


Howard A. Kroll

Date May 17, 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))