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2012 JAN -3 AM 11:37

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

BY _____

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7 Attorneys for Plaintiffs,
KTS KARAOKE, INC., and TIMMY SUN TON
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9
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13
14 KTS KARAOKE, INC., a California
15 corporation, and TIMMY SUN TON,
individually.

16 Plaintiffs,

17 vs.

18 SONY/ATV MUSIC PUBLISHING,
19 LLC, a Delaware Limited Liability
20 Company; and DOES 1 to 10, inclusive,

21 Defendants.
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CASE NO.: CV 12 0014 JHN JEM

COMPLAINT FOR

- 1) DECLARATION OF NON-INFRINGEMENT AND/OR REDUCTION IN THE AMOUNT OF CLAIMS IN ISSUE
- 2) UNFAIR COMPETITION AND UNFAIR TRADE PRACTICES

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1 has already recovered damages for the distribution of the subject discs and without
2 allowing credit for all sums so recovered.

3 9. A dispute has also arisen as to whether SONY/ATV has committed
4 copyright misuse by unjustifiably and illegally seeking to and, in fact, recovering
5 multiple times for the distribution of the same allegedly infringing discs, which
6 SONY/ATV knowingly allowed to be manufactured and distributed in the first place,
7 to further its scheme to obtain multiple recoveries by going after sub-distributors
8 while failing to take action against those parties which actually created and first
9 distributed the discs in issue.

10 10. The disputes amongst the parties are ripe for adjudication.

11 11. KTS therefore asks that this Court declare that KTS has not infringed
12 any rights of SONY/ATV but that if any acts of infringement have occurred that
13 infringement has not occurred to the extent claimed by SONY/ATV and further that
14 any such infringement occurred as a result of SONY/ATV's actions and/or inaction in
15 allowing the subject karaoke discs to be placed in the stream of commerce without
16 taking reasonable steps to stop their manufacture and distribution at the source.

17 12. KTS also seeks a declaration that SONY/ATV is limited to one recovery
18 per work and cannot recover a second (or more) times for the re-distribution of the
19 same songs which SONY/ATV has previously recovered for from others.

20
21 **SECOND CAUSE OF ACTION**

22 **(Unfair Competition and Unfair Trade Practices)**

23 13. KTS repeats and realleges all of the allegations contained in Paragraphs
24 1 through 12, inclusive, of this Complaint and by reference thereto incorporate them
25 herein as though set forth in full.

26 14. Upon information and belief, Defendant has committed acts of unfair
27 competition and unfair trade practices in violation of the common law of the State of
28 California based on a scheme to extort money from innocent distributors ensnared

1 into distributing infringing works which SONY/ATV has knowingly allowed to enter
2 and/or remain in the stream of commerce.

3 15. KTS is informed and believes and based thereon alleges that
4 SONY/ATV has allowed the karaoke music discs at issue to be placed in the stream
5 of commerce so that SONY/ATV could make claims against various sub-distributors
6 and thereby recover multiple times for the same allegedly infringing conduct at rates
7 greater than if the claims had been asserted against the manufacturers. The scheme
8 by SONY/ATV and its counsel is not designed to stop the acts of infringement (as
9 SONY/ATV has knowingly allowed the manufacturer and initial distribution of some
10 if not all of the subject discs) but has actually encouraged, caused and contributed to
11 such alleged acts of infringement for the purpose of unjustifiably and illegally
12 extracting multiple recoveries for the same infringing discs and to line the pockets of
13 SONY/ATV and its counsel.

14 16. Upon information and belief, Defendant has been unjustly enriched by
15 its acts of unfair competition and unfair trade practices.

16 17. KTS is informed and believes, and thereupon alleges, that the acts
17 alleged above were willful, fraudulent, malicious and oppressive and were undertaken
18 with the intent to harm KTS, or were done with reckless disregard of KTS's rights,
19 and justify the awarding of punitive damages so as to set an example and to deter
20 others from engaging in such conduct.

21 18. KTS has suffered, is suffering, and will continue to suffer irreparable
22 injury for which KTS has no adequate remedy at law.

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PRAYER FOR RELIEF

25 WHEREFORE, KTS prays for judgment against the Defendant SONY/ATV as
26 follows:

27 1. For a declaration that KTS has not infringed any rights of SONY/ATV
28 but that if any acts of infringement have occurred that infringement has not occurred

1 to the extent claimed by SONY/ATV and further that any such infringement occurred
2 as a result of SONY/ATV's actions and/or inaction in allowing the subject karaoke
3 discs to be placed in the stream of commerce without taking reasonable steps to stop
4 their manufacture and distribution at the source.

5 2. For a declaration that SONY/ATV is limited to one recovery per work
6 and cannot recover a second (or more) times for the re-distribution of the same songs
7 which SONY/ATV has previously recovered for from others.

8 3. That KTS have judgment against SONY/ATV for all damages suffered
9 by KTS as a result of the advertisement, offer to sell and sale of the products in issue
10 which would not have occurred but for SONY/ATV's acts of copyright misuse and
11 SONY/ATV's encouraging, causing and contributing to the distribution of the subject
12 songs in issue.

13 4. That KTS be awarded damages against SONY/ATV in an amount
14 according to proof for SONY/ATV's acts of unfair competition and unfair trade
15 practices;

16 5. That SONY/ATV be preliminarily and permanently enjoined from
17 committing further acts of unfair competition and unfair trade practices.

18 6. That KTS have judgment against the SONY/ATV for KTS's costs and
19 attorney's fees.

20 5. That the Court grant such other, further and different relief as the Court
21 deems just and proper under the circumstances.

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23 Dated: January 3, 2012

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THE SONI LAW FIRM
BY: 
Surjit P. Soni

Attorneys for Plaintiffs,
KTS KARAOKE, INC., and TIMMY SUN TON

**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 Jacqueline Nguyen and the assigned discovery Magistrate Judge is John E. McDermott.

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

CV12- 14 JHN (JEMx)

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.

Name & Address:
Surjit P. Soni (State Bar No. 127419)
M. Danton Richardson (State Bar No. 141709)
THE SONI LAW FIRM
35 N. Lake Ave., Suite 720
Pasadena, CA 91101

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KTS Karaoke, INC., a California Corporation, and
TIMMY SUNTON, Individually

CASE NUMBER

PLAINTIFF(S)

CV 12 0014 JHN(JEM)

v.

SONY/ATV MUSIC PUBLISHING, LLC, a Delaware
Limited Liability Company; and DOES 1 to 10,
Inclusive,

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S): Sony/ATV Music Publishing, LLC, a Delaware limited liability company

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, Surjit P. Soni, The Soni Law Firm, whose address is 35 N. Lake Ave., Suite 720, Pasadena, CA 91101. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JAN - 3 2012

By: _____

MARILYN DAVIS
Deputy Clerk
USDC
(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)].

CONFORMED COPY

Name & Address:

Surjit P. Soni (State Bar No. 127419)
M. Danton Richardson (State Bar No. 141709)
THE SONI LAW FIRM
35 N. Lake Ave., Suite 720
Pasadena, CA 91101

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KTS Karaoke, INC., a California Corporation, and
TIMMY SUN TON, Individually

PLAINTIFF(S)

v.

SONY/ATV MUSIC PUBLISHING, LLC, a Delaware
Limited Liability Company; and DOES 1 to 10,
Inclusive,

DEFENDANT(S).

CASE NUMBER

CV 12 0014 - JHN (JEM)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Surjit P. Soni, The Soni Law Firm, whose address is 35 N. Lake Ave., Suite 720, Pasadena, CA 91101. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

By: Mandy Dun
Deputy Clerk

(Seal of the Court)

Dated: JAN - 3 2012

ORIGINAL

[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)].

(a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) KTS Karaoke, INC., a California Corporation, and TIMMY SUN TON. Individually	DEFENDANTS SONY/ATV MUSIC PUBLISHING, LLC, a Delaware Limited Liability Company, and DOES 1 to 10, Inclusive,
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(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Sriji P. Soni (State Bar No. 127419) M. Danton Richardson (State Bar No. 141709) 35 N Lake Ave., Suite 720, Pasadena, CA 91101	Attorneys (If Known)
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BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> U.S. Government Plaintiff <input checked="" type="checkbox"/> Federal Question (U.S. Government Not a Party) <input type="checkbox"/> U.S. Government Defendant <input type="checkbox"/> 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-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</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 type="checkbox"/> 2</td> <td style="text-align: center;"><input 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>		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
	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.)

<input type="checkbox"/> Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check "Yes" only if demanded in complaint.)

CROSS ACTION under F.R.C.P. 23: Yes No MONEY DEMANDED IN COMPLAINT: \$

V. 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.)
17 USC Sections 101 et (SEQ) and 28 USC Section 2201

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

OTHER STATUTES <input type="checkbox"/> 100 State Reapportionment <input type="checkbox"/> 110 Antitrust <input type="checkbox"/> 130 Banks and Banking <input type="checkbox"/> 150 Commerce/ACC Rates/etc. <input type="checkbox"/> 160 Deportation <input type="checkbox"/> 170 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 180 Consumer Credit <input type="checkbox"/> 190 Cable/Sat TV <input type="checkbox"/> 210 Selective Service <input type="checkbox"/> 250 Securities/Commodities/Exchange <input type="checkbox"/> 275 Customer Challenge 12 USC 3410 <input type="checkbox"/> 290 Other Statutory Actions <input type="checkbox"/> 291 Agricultural Act <input type="checkbox"/> 292 Economic Stabilization Act <input type="checkbox"/> 293 Environmental Matters <input type="checkbox"/> 294 Energy Allocation Act <input type="checkbox"/> 295 Freedom of Info. Act <input type="checkbox"/> 300 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 350 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contractor Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor Mgmt. Relations <input type="checkbox"/> 730 Labor Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CONFORMED COPY CV 12 0014

COURT OFFICE USE ONLY: Case Number: _____

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

(a) IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes

1. list case number(s): _____

(b) RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes

2. list case number(s): _____

3. If 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

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

5. 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	

6. 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	

7. 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	

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

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

SIGNATURE OF ATTORNEY (OR PRO PER)  Date January 3, 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.)

10. 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))