

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

NATIONAL FEDERATION OF THE §
BLIND OF TEXAS, AUNDREA MOORE, §
NEVZAT ADIL, STEVE ELLIOT, §
DEMETRIUS KOUNIARIS, and §
JEANINE LINEBACK, §
Plaintiffs, §

v. §

CIVIL ACTION NO. 1:16-cv-01083

GET ME, LLC, §
Defendant. §

PLAINTIFFS’ ORIGINAL COMPLAINT

INTRODUCTION

1. Defendant Get Me, LLC, a “ride hailing” transportation provider in Austin, Texas, discriminates against blind individuals by refusing to make its mobile phone apps accessible to them. This failure violates federal and state law. This action, brought by the National Federation of the Blind of Texas and by various individuals with visual impairments, seeks to put an end to Get Me’s systemic civil rights violations so that blind travelers may patronize the transportation services that defendant offers to others.

JURISDICTION AND VENUE

2. This Court has jurisdiction to hear and decide Plaintiff’s ADA claims pursuant to 28 U.S.C. § 1331 (federal question) and § 2201 (civil rights). This Court also has supplemental jurisdiction to hear Plaintiff’s state-law claims under 28 U.S.C. § 1367(a).

3. Venue for this action is proper in this Court under 28 U.S.C. § 1391(b)(2) and (c)(2), because the claims arose in this District, and because Defendant conducts business in this District.

PARTIES

4. Plaintiff National Federation of the Blind of Texas (hereafter “NFBTX”) is a duly organized nonprofit association of blind Texans. It is the Texas state affiliate of the National Federation of the Blind. The NFBTX’s mission is to promote the vocational, cultural, and social advancement of the blind; to achieve the integration of the blind into society on a basis of equality with the sighted; and to take any other action which will improve the overall condition and standard of living of the blind. Reliable access to modern, publicly available transportation services such as Get Me is critical to the NFBTX and its members. Securing access to the Get Me taxi service advances the NFBTX’s goal to promote integration of the blind into society on a basis of equality by enabling blind individuals to travel in the same way that many sighted individuals travel. Get Me is currently inaccessible to blind users. The NFBTX sues on behalf of its members who have downloaded Get Me and have been unable to access it due to unlawful discrimination against blind individuals, and also members who have been deterred from using the Get Me service due to unlawful discrimination against blind individuals. NFBTX also sues in furtherance of its extensive efforts and expenditure of resources in advancing its mission to improve independence of the blind. Securing access to Get Me’s services advances this mission because access to Get Me enables blind individuals to travel more independently, including to travel to NFBTX events. Thus, discrimination against members of NFBTX and other blind individuals frustrates this mission of the NFBTX and results in the diversion of its resources to address Defendant’s discriminatory practices.

5. Plaintiff Aundrea Moore is blind, is a member of the NFBTX, and currently resides in Austin, Texas. Ms. Moore is retired from a career at the Texas Attorney General’s office. Ms. Moore regularly travels and regularly uses taxis in Austin for personal

transportation. Though Ms. Moore would like to use the Get Me transportation service, she is deterred from signing up for and attempting to use Get Me's transportation services because of the discrimination that other blind users have experienced when attempting to use Get Me's mobile software application. Ms. Moore owns and regularly uses an iPhone capable of running the Get Me iOS application, and Ms. Moore has a credit card that she could use to pay for the Get Me transportation service.

6. Plaintiff Nevzat Adil is blind, is a member of the NFBTX, and currently resides in Austin, Texas. Mr. Adil is retired, and regularly travels and regularly uses taxis in Austin for personal transportation. Though Mr. Adil would like to use the Get Me transportation service, he is deterred from signing up for and attempting to use Get Me's transportation services because of the discrimination that other blind users have experienced when attempting to use Get Me's mobile phone software application. Mr. Adil owns and regularly uses an iPhone capable of running the Get Me iOS application, and Mr. Adil has a credit card that he could use to pay for the Get Me service.

7. Plaintiff Steve Elliot has a visual impairment, is a member of the NFBTX, and currently resides in Austin, Texas. Mr. Elliot is a lawyer, and he uses screen-reader technology. He regularly travels and regularly uses taxis in Austin for personal transportation. Mr. Elliot wishes to use Get Me's transportation services, and he owns and regularly uses an iPhone mobile device capable of running the Get Me iOS application. He also has a credit card that he could use to pay for the Get Me transportation service. Mr. Elliot downloaded the Get Me software application and attempted to use it on multiple occasions, but was unable to schedule a ride because Get Me's software application had not properly labeled and coded its software for text-to-speech software.

8. Plaintiff Demetrius Kouniaris is blind, and is a student living in Austin, Texas. He is also a member of the NFBTX. Mr. Kouniaris regularly travels and regularly uses taxis in Austin for personal transportation. Mr. Kouniaris wishes to use Get Me's transportation services, and he owns and regularly uses an iPhone mobile device capable of running the Get Me iOS application. He also has a credit card that he could use to pay for the Get Me transportation service. Mr. Kouniaris downloaded the Get Me software application and attempted to use it, but he was unable to use Get Me's mobile-device application to schedule a ride because he was unable to move past the credit card information screen.

9. Plaintiff Jeanine Lineback is blind and is a senior accessibility consultant in Austin, Texas. She is a member of the NFBTX, and currently serves as the President of its Austin Chapter. Ms. Lineback regularly travels and regularly uses taxis in Austin for personal transportation. Ms. Lineback wishes to use Get Me's transportation services, and she owns and regularly uses both an Android and iPhone mobile device capable of running the Get Me iOS and Android application. She also has a credit card that she could use to pay for the Get Me transportation service. Ms. Lineback downloaded the Get Me software application and attempted to use it, but was unable to do so because Get Me had not correctly labeled and coded its software application.

10. The term "Plaintiffs" used in this complaint means both NFBTX, on behalf of itself and its members who have attempted to use or are deterred from using the Get Me taxi service because of discrimination against blind persons, and the individual plaintiffs described above, unless otherwise indicated.

11. Defendant Get Me, LLC (hereafter "Get Me") is a for-profit transportation network company operating in Austin, Texas. It provides transportation services through

thousands of vehicles in Texas. Get Me uses mobile phone software applications to arrange rides between passengers and its fleet of drivers in much the same way that a taxi dispatch arranges rides for customers. Get Me uses its own mobile-phone software application to arrange for these rides. Get Me can be served with process by serving its registered agent, National Registered Agents, Inc., at 1999 Bryan Street, Ste. 900, Dallas, Texas 75201.

FACTUAL ALLEGATIONS

12. Get Me provides taxi and transportation services to members of the general public in a growing number of metropolitan areas across Texas and the United States. Get Me offers its service to sighted individuals in Austin, Texas. Get Me is highly cost-effective and widely available in Austin, Texas, and it became one of the primary taxi services in Austin when two other prominent taxi services ceased operations in Austin in May 2016.

13. Get Me uses mobile-device software applications to arrange rides between passengers and its fleet of Get Me drivers in much the same way that a taxi dispatch arranges rides for customers. To use Get Me taxi services, a customer must create a user account, and the customer must provide Get Me with his or her phone number, credit card information, and email address. Get Me has developed mobile software applications for iPhones and Android devices that customers use to request transportation from Get Me.

14. To use the Get Me taxi service, a customer submits a ride request through Get Me's mobile software applications. Get Me identifies the vehicle that will provide the customer with taxi service, and notifies the customer of the driver's information through its mobile-device application. Get Me's mobile application allows customers to track the Get Me vehicle's location as the driver navigates to the customer. The customer may also submit his or her trip destination through Get Me's mobile application.

15. Get Me controls who may use the Get Me taxi service. Get Me makes the Get Me service available only to members of the public who have a credit card and a mobile device that can run its mobile applications, who create a Get Me account, and who request a ride through Get Me's mobile application. Customers cannot access the Get Me taxi service by physically hailing a Get Me vehicle on the street.

16. Many blind individuals, including members of Plaintiff NFBTX, use text-to-speech software. Text-to-speech software is commonly used by persons who are blind or visually impaired and it enables blind persons to operate mobile devices by translating visual information and text displayed on the phone into audible synthesized speech or into Braille on a portable electronic braille display.

17. Get Me does not allow users who are blind and who use text-to-speech software to access its mobile device software application because it does not have a mobile device software application that is accessible to blind users who use text-to-speech software

18. Members of NFBTX and other blind individuals would like to use Get Me's service but have been deterred from downloading the software application because the software application is inaccessible to text-to-speech technology. Text-to-speech technology is built into iPhones. Text-to-speech software, commonly used by persons who are blind or visually impaired, enables blind persons to operate mobile devices by translating visual information and text displayed on a touchscreen device into audible synthesized speech or into Braille on a portable electronic braille display.

19. Companies like Apple and Google have already done part of the work to assist app developers in making their apps accessible, by publishing accessibility guidelines. These

show how to correctly identify and code the data fields in software applications in a way that enables the text-to-speech software to “read” the information to blind users.

20. It is not difficult for a mobile developer to properly code a mobile app so that it is accessible in accordance with the Apple and Google accessibility guidelines. In fact, most controls and elements are accessible by default in the programming environment. A developer must stray from common functionality to develop an inaccessible mobile app. Many small companies, including mobile app developers consisting of a single owner/programmer, are able to maintain accessibility of their mobile apps. Further, other competing taxi services of similar size to Defendant that are operating in Austin have incorporated accessibility into their mobile apps.

21. Get Me’s mobile software application homepage has two buttons. The two buttons are labeled “something” and “somewhere.” The “something” button is for delivery of goods, and the “somewhere” button is for taxi services. Get Me has labeled these two fields sufficiently and text-to-speech users are able to decipher which button they should select for the desired service.

22. Upon selecting the “somewhere” option for taxi services, Get Me’s software application opens a new page. Get Me has correctly labeled and coded the data field for pick-up location and the text-to-speech technology can read it, and the user can input her pick-up location. However, after inputting the information, the Get Me software application has not labeled or coded any other information on the screen for the text-to-speech software to read. A sighted user would see that there is a request ride, estimate fare, and promo code button at the bottom of the page. But blind users using text-to-speech technology cannot access these buttons

because Get Me has not labeled and coded these buttons appropriately. Blind text-to-speech users have no way to submit their information and move past the pick-up location field.

23. Get Me also makes its payment page inaccessible. Get Me has the fields for credit card number and expiration date labeled correctly for text-to-speech technology, but the CCV field is not labeled at all and the text-to-speech technology has no audio information about this field. As a result, blind users using text-to-speech technology cannot complete the credit card verification process.

24. Several individuals with visual impairments have tried to use the Get Me app without success. For example, Plaintiff Steve Elliot downloaded the Get Me software application on or about May 15, 2016. Mr. Elliot had sought to use Get Me to attend work-related meetings. During the download process he never encountered any “Terms or Conditions” of its use, nor was he given any opportunity to review or agree to them. Mr. Elliot attempted to use the software on approximately three occasions between May 15, 2016 and May 17, 2016, but he was unable to schedule a ride because Get Me’s software application had not properly labeled and coded its software for text-to-speech software.

25. Similarly, Plaintiff Demetrius Kouniaris downloaded the Get Me software application on or about June 1, 2016. Mr. Kouniaris had sought to use Get Me to attend a meeting at Austin Community College. He also wanted to use it to get to a doctor’s appointment later that week. During the download process he never encountered any “Terms or Conditions” of its use, nor was he given any opportunity to review or agree to them. Mr. Kouniaris attempted to use the software, but he was unable to schedule a ride from Get Me’s taxi service because he was unable to move past the credit card information screen.

26. Plaintiff Jeanine Lineback downloaded the Get Me software application on or about May 9, 2016. During the download process she never encountered any “Terms or Conditions” of its use, nor was she given any opportunity to review or agree to them. After multiple tries, Ms. Lineback was able to set up an account. However, when Ms. Lineback attempted to use the software and actually request a ride, she was unable to do so because Get Me had not correctly labeled and coded the software application. The only “readable” information on the request a ride screen was the Get Me logo.

27. The Plaintiffs and other blind individuals submitted written inquiries to Get Me concerning the accessibility of the mobile device software application, hoping to resolve this matter without litigation. But Get Me failed to explain whether Get Me has any concrete plans to make the software accessible, and it has not taken any other meaningful steps to ensure that its software is accessible. Further, Get Me has not given a timeline of when the software might be made accessible.

28. Plaintiff Aundrea Moore is blind, is a member of the NFBTX, and currently resides in Austin, Texas. She is aware of discussions about the inaccessibility of the Get Me mobile app in NFBTX forums and at recent NFBTX events. Ms. Moore learned of its inaccessibility during these discussions and was deterred from downloading Get Me because she did not want to face the same discrimination others had faced. On or about May 14, 2016, she attended a party at the home of a friend. She would have liked to use Get Me to go home from the party, but she did not attempt to download it because she knew it would not be accessible to her.

29. Plaintiff Nevzat Adil is blind, is a member of the NFBTX, and currently resides in Austin, Texas. He is aware of discussions about the inaccessibility of the Get Me mobile app in

NFBTX forums and at NFBTX recent events. Mr. Adil also learned of its inaccessibility from one of his friends. Mr. Adil was deterred from downloading Get Me because he did not want to face the same discrimination others had faced. Mr. Adil had two doctor's appointments in mid-July 2016 that he would have used Get Me to attend, but he did not attempt to download the app because he knew it would not be accessible to him.

30. When Get Me makes it impossible for blind riders to independently use its software application, blind individuals experience several harms. They must arrange alternate transportation that is sometimes more costly, they face the degrading experience of being denied a basic service that is available to all other paying customers, and they face the degrading experience of relying on a sighted person to assist them with a task they could easily perform themselves if the software application was accessible.

31. Get Me is violating basic equal access requirements under both the Americans with Disabilities Act ("ADA") and state law by failing to implement policies and procedures that would prevent or reduce discrimination against blind riders. Get Me and other similar taxi services are a critical transportation option for many blind individuals in Austin, Texas. Due to distances between destinations and the limitations of public transportation and paratransit, many blind persons must use taxi services to travel from one place to another. The fact that Get Me does not have an accessible software application for blind users, and the fact that this discrimination deters blind individuals including the Plaintiffs from using Get Me, means that such persons are denied full and equal access to this critical mode of transportation.

32. Due to the public's widespread adoption of mobile devices, Get Me and other transportation network companies are quickly supplanting traditional taxi companies and

becoming the public's primary option for on-demand taxi services. Get Me offers taxi services in Austin and other Texas cities.

33. Get Me is a private entity primarily engaged in the business of transporting people.

34. Get Me provides transportation to the general public on a regular and continuing basis.

35. Get Me does not provide a fixed-route system.

36. Get Me operates a "demand responsive" transportation system.

37. Get Me provides transportation services through a network of drivers who work with Get Me under a contractual or other arrangement.

38. Get Me's services include transportation services that involve calling for a vehicle and a driver to take one places.

39. Get Me's operations affect interstate commerce.

40. Congress provided a clear and national mandate for the elimination of discrimination against individuals with disabilities when it enacted the ADA. Such discrimination includes discrimination in the provision of taxi and transportation services. Similarly, Texas state law requires full and equal access to all business establishments and places where the public is invited, including vehicles providing taxi services.

**FIRST CAUSE OF ACTION
VIOLATION OF TITLE III OF THE AMERICANS WITH DISABILITIES ACT
(42 U.S.C. § 12181 *et seq.*)**

41. Plaintiffs incorporate by reference the foregoing allegations as though fully set forth herein.

42. Title III of the ADA prohibits discrimination on the basis of disability in the full and equal enjoyment of public transportation services provided by a private entity primarily engaged in the business of transporting people, and whose operations affect commerce. 42 U.S.C. § 12184(a); 49 C.F.R. § 37.5(a), (f).

43. Get Me operates a “demand responsive” transportation system even if it does so by contracting with others to drive. 49 C.F.R. § 37.3.

44. The ADA prohibits private entities providing specified public transportation from imposing eligibility criteria that screen out or tend to screen out individuals with disabilities from fully enjoying the specified public transportation services provided by the entity, unless such criteria can be shown to be necessary for the provision of the services being offered. 42 U.S.C. § 12184(b)(1); 28 C.F.R. § 36.302(a).

45. By operating a taxi service that does not allow blind users to independently access its software application, Defendant violates Title III of the ADA because Defendant is utilizing eligibility criteria that screen out or tend to screen out Plaintiffs and other blind individuals from fully enjoying the Get Me taxi service. 42 U.S.C. § 12184(b)(1); 28 C.F.R. § 36.302(a).

46. It is a violation of Title III for providers of transportation to fail to make reasonable modifications in policies, practices, or procedures when such modifications are necessary to afford such goods, services, facilities, privileges, advantages, or accommodations to individuals with disabilities, unless the entity can demonstrate that making such modifications would fundamentally alter the nature of such goods, services, facilities, privileges, advantages, or accommodations. 42 U.S.C. § 12184(b)(2)(A); 49 C.F.R. § 37.5(f).

47. By failing to modify practices, policies, and procedures to ensure that Get Me's software application is accessible to text-to-speech users, Defendant is denying Plaintiffs full and equal access to Get Me's taxi services.

48. Title III regulations prohibit private entities providing taxi services from discriminating by refusing to provide taxi services to people with disabilities who can physically access taxi vehicles. 42 U.S.C. § 12184(b)(4)(B); 49 C.F.R. §§ 37.5(a)-(b), (f), 37.29(c).

49. Defendant violates Title III of the ADA by refusing to provide transportation services to blind individuals who can physically access Get Me vehicles, but cannot access Get Me's software application. Defendant therefore violates Title III of the ADA by denying Plaintiffs full and equal access to the services, facilities, privileges, advantages, and accommodations of vehicles providing the Get Me taxi service.

50. The actions of Defendant were and are in violation of the Americans with Disabilities Act, 42 U.S.C. §§ 12181, *et seq.*, and regulations promulgated thereunder. Defendant has failed to take any equitable steps to remedy its discriminatory conduct, and Defendant's violations of the ADA are ongoing. Defendant's unlawful actions deter members of Plaintiff NFBTX, including Plaintiffs Moore and Adil, from attempting to access the Get Me taxi service. Unless the Court enjoins Defendants from continuing to engage in these unlawful practices, Plaintiffs will continue to suffer irreparable harm.

51. Plaintiffs are entitled to injunctive relief under 42 U.S.C. § 12188.

**SECOND CAUSE OF ACTION
VIOLATION OF CHAPTER 121 OF THE TEXAS HUMAN RESOURCES CODE**

52. Plaintiffs incorporate by reference the foregoing allegations as though fully set forth herein.

53. Plaintiffs bring this cause of action under Chapter 121 of the Texas Human Resources Code.

54. Defendant is a “public facility” as defined by Texas Human Resources Code § 121.002(5) because it is a common carrier, motor vehicle, or other public conveyance or mode of transportation.

55. Among other things, Chapter 121 states that “[p]ersons with disabilities have the same right as persons without disabilities to the full use and enjoyment of any public facility in the state.” Texas Human Resources Code § 121.003(a). As described above, Defendant violated this provision when it denied Plaintiffs the use and enjoyment of its facility on the basis of their disability.

56. Defendant also discriminated against Plaintiffs as defined by Chapter 121 by:

- a. Denying Plaintiffs admittance to its public facility because of their disability, in violation of Texas Human Resources Code § 121.003(c);
- b. Denying the use of their assistance device, in violation of Texas Human Resources Code § 121.003(c);
- c. Refusing to allow them to use its public facility, in violation of Texas Human Resources Code § 121.003(d);
- d. Adopting a ruse or subterfuge calculated to prevent or discourage them from using or being admitted to a public facility, in violation of Texas Human Resources Code § 121.003(d);

- e. Failing to make reasonable accommodations to its policies, practices, and procedures, in violation of Texas Human Resources Code § 121.003(d)(2);
- f. Prohibiting the use of its public facility by a person with a disability who, except for his disability, would fall within the class of people permitted to use the public facility, in violation of Texas Human Resources Code § 121.003(e).

57. Chapter 121 provides for the recovery of actual and punitive damages. Chapter 121 sets no cap on such damages, but there is a conclusive presumption that such damages are no less than three hundred dollars (\$300) for each violation of the law. Tex. Hum. Res. Code § 121.004(b).

58. Defendant's conduct described above was intentional and taken in disregard of the rights afforded Plaintiffs under state law, and Defendant acted with fraud, malice, or gross negligence.

PRAYER

Plaintiffs request that the Court:

- a. Exercise jurisdiction over this action;
- b. Grant Plaintiffs declaratory relief;
- c. Enter a permanent injunction under federal and state law prohibiting Defendant from continuing to discriminatorily exclude Plaintiffs from its transportation services; affirmatively requiring Defendant to remove any barriers to access to its services; and allowing Plaintiffs to participate in its programs on a basis equal to other persons;
- d. Award Plaintiffs compensatory and punitive damages under state law;
- e. Award Plaintiffs their attorney's fees and litigation expenses under federal law;

- f. Award Plaintiffs all costs expended herein under state and federal law; and
- g. Grant Plaintiffs such other and further relief as may be deemed just, equitable and appropriate by the Court.

Respectfully submitted,



BRIAN EAST

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ATTORNEYS FOR PLAINTIFFS

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The 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, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

National Federation of the Blind of Texas, Aundrea Moore, Nevzat Adil, Steve Elliot, Demetrius Kouniaris, and Jeanine Lineback

DEFENDANTS

Get Me, LLC

(b) County of Residence of First Listed Plaintiff Travis
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Brian East, Lia Davis, Disability Rights Texas, 2222 W. Braker Ln., Austin, TX 78758, 512.454.4816; Timothy Elder, TRE Legal Practice, 4226 Castanos St., Fremont, CA 94536, 410.415.3493

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 (Place an "X" in One Box for Plaintiff and One Box 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. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	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 Federal 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 - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability 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	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input 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 SSJD 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	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<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	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	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 Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. 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 Multidistrict Litigation

VI. CAUSE OF ACTION

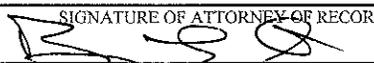
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 42 U.S.C. § 12181 et seq.
 Brief description of cause:
 Refusal to provide accessible technology to blind individuals.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 09/20/2016 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____