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RICHARD W. WIEKING
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NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CV 12 3885
Case No.:

16 CENTER FOR INDEPENDENT LIVING,
17 INC., JANET BROWN, and LISA KILGORE
18 on behalf of themselves and all others
19 similarly situated,

Plaintiffs,

v.

21 WAL-MART STORES, INC.,

Defendant.

COMPLAINT FOR VIOLATIONS OF
THE AMERICANS WITH DISABILITIES
ACT, 42 U.S.C. § 12101, *et seq.*, THE
UNRUH CIVIL RIGHTS ACT, CAL. CIV.
CODE § 51, *et seq.*, and THE
CALIFORNIA DISABLED PERSONS
ACT, CAL. CIV. CODE §§ 54-54.3.

CLASS ACTION

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INTRODUCTION

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2 1. This class action lawsuit challenges ongoing discrimination by defendant Wal-
3 Mart Stores, Inc. (“Defendant” or “Wal-Mart”) based on the company’s refusal to provide
4 accessible point of sale (“POS”) terminals for consumers with mobility disabilities who use
5 wheelchairs and scooters, at many of Wal-Mart’s retail stores throughout California. POS
6 terminals allow customers to input sensitive and private information in a secure manner such as
7 their Personal Information Number (PIN); submit debit or credit card data by swiping a payment
8 card; verify, authorize or cancel a transaction; submit a signature; provide the consumer with the
9 option to select to receive cash-back from their account; select an amount of cash back to be
10 provided; and perform other affiliated tasks which involve inputting, correcting, cancelling or
11 entering information that is personal or affects access to personal information and finances.

12 2. POS terminals at multiple Wal-Mart stores are mounted at inaccessible heights so
13 that customers who use wheelchairs or scooters have to struggle to process their payment
14 securely or cannot see the display screens or independently use the terminals. Wal-Mart has for
15 years known of the discriminatory impact of its inaccessible POS terminals for its customers
16 with mobility disabilities, yet insists on continuing to use inaccessible devices in many of its
17 stores. Reliable alternative POS terminal are readily available that would provide secure,
18 independent and equal access.

19 3. Because many customers who use wheelchairs and scooters cannot easily view,
20 reach and use Wal-Mart’s POS terminals securely and independently, they must often process
21 their transactions without knowing the information displayed on the POS viewscreen. Often,
22 customers in wheelchairs and scooters must stretch and strain upwards just to try to see enough
23 of the viewscreen to process the transaction using their credit or debit card. In multiple instances
24 disabled customers have been forced to divulge private information such as their PIN to a cashier
25 or other third party, ask the cashier or others to input information and select specific functions
26 available at the POS terminals, and/or ask a cashier and/or others to sign on their behalf in order
27 to complete transactions. These problems with the accessibility of the POS terminals are
28 exacerbated by the fact that many of the POS terminals require extensive twisting and pinching

1 of customers' wrists and arms to adjust. These circumstances make the transaction payment
2 process at many Wal-Mart stores difficult for customers with disabilities.

3 4. Wal-Mart has continued to use POS terminals mounted at inaccessible heights in
4 many of its stores despite the fact that alternative designs are readily available that make the
5 payment process much more accessible for people with disabilities. Many of Wal-Mart's
6 competitors utilize POS terminals mounted at lower heights and/or attached by cords that permit
7 greater flexibility of movement and operation. A number of Wal-Mart's own stores now use
8 POS terminals mounted at such lower heights, with equipment that allows for an easy adjustment
9 of the angle of the viewscreen. Despite the availability and feasibility of these options, Wal-
10 Mart refuses to replace older equipment in many of its stores which is mounted in a manner that
11 makes the payment process unmanageable for many wheelchair and scooter users.

12 5. Through the Americans with Disabilities Act, Congress provided a clear and
13 national mandate for the elimination of discrimination against individuals with disabilities. Such
14 discrimination includes barriers to full integration, independent living, and equal opportunity for
15 persons with disabilities. Similarly, California law requires full and equal access to all business
16 establishments and places where the public is invited. By refusing to make modifications to its
17 POS equipment and check-out stands that would render its POS equipment accessible, Wal-Mart
18 is discriminating against persons with mobility disabilities who use wheelchairs and scooters in
19 violation of the Americans with Disabilities Act, 42 U.S.C. § 12182 *et seq.*, California's Unruh
20 Civil Rights Act, California Civil Code § 51 *et seq.* and the California Disabled Persons Act,
21 California Civil Code §§ 54-54.3.

22 **JURISDICTION**

23 6. This is an action for declaratory relief, injunctive relief, and damages, brought
24 pursuant to Title III of the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12182 *et seq.*,
25 California's Unruh Civil Rights Act, California Civil Code § 51 *et seq.* (the "Unruh Act") and
26 portions of the California Disabled Persons Act ("CDPA"), specifically California Civil Code §§
27 54-54.3.

1 to supporting people with disabilities in their efforts to live independent lives. As part of its
2 mission, CIL works to ensure that all aspects of human experience are accessible to people with
3 disabilities.

4 14. Given its mission, CIL has legal standing to represent the interests of California
5 residents who use wheelchairs and scooters. CIL has suffered injury due to the diversion of its
6 time and resources caused by the barriers at issue, including but not limited to CIL's attempts to
7 persuade Wal-Mart to address and respond to complaints regarding the inaccessibility of many of
8 its POS machines.

9 15. Named Plaintiff Janet Brown is a resident of Pittsburgh, California. Ms. Brown is
10 an individual with a disability under all applicable statutes due to her mobility disability. She is
11 a wheelchair user who regularly shops at the Wal-Mart store located in Pittsburgh, California.
12 Ms. Brown cannot see the display screen of the POS terminals at this Wal-Mart and cannot
13 independently access the terminals. Ms. Brown was and currently is directly harmed by Wal-
14 Mart's failure to provide accessible POS terminals.

15 16. Named Plaintiff Lisa Kilgore is a resident of San Pablo, California. Ms. Kilgore
16 is an individual with a disability under all applicable statutes due to her mobility disability. She
17 has used a wheelchair for over forty years. Ms. Kilgore visits the Wal-Mart store in Richmond,
18 California approximately five times per month. Ms. Kilgore is unable to see the display screens
19 of the POS terminals at this Wal-Mart store and cannot independently access the terminals. Ms.
20 Kilgore was and currently is directly harmed by Wal-Mart's failure to provide accessible POS
21 terminals.

22 17. The Plaintiff class consists of all persons with disabilities who use wheelchairs
23 and scooters as mobility aids who have been and/or are being denied equal access to POS
24 terminals at Wal-Mart stores in California.

25 18. Defendant Wal-Mart is the world's largest retailer and private employer. Wal-
26 Mart is a public company whose stock is traded on the New York Stock Exchange under the
27 symbol "WMT." Wal-Mart is a Delaware corporation with stores throughout California. Wal-
28 Mart's corporate headquarters are located in Bentonville, Arkansas. Wal-Mart operates retail

1 stores doing business as Wal-Mart, Wal-Mart Supercenters and Wal-Mart Discount Stores
2 (hereinafter collectively “Wal-Mart stores”).

3 19. Defendant Wal-Mart is responsible for the operations of Wal-Mart stores located
4 throughout California including the stores located in Pittsburgh (#1615) and Richmond (#3455).

5 **CLASS ALLEGATIONS**

6 20. Pursuant to Rules 23(a), 23(b)(2), and 23(b)(3) of the Federal Rules of Civil
7 Procedure, the Named Plaintiffs bring this action, for injunctive and declaratory relief, and
8 statutory damages, on their own behalf and on behalf of all persons similarly situated. The class
9 the Named Plaintiffs seek to represent is composed of “all persons with disabilities who use
10 wheelchairs and scooters as mobility aids who have been or who are currently being denied
11 equal access to point of sale terminals at Wal-Mart stores in California.”

12 21. The persons in the class are so numerous that joinder of all such persons is
13 impracticable and the disposition of their claims in a class action is a benefit to the parties and to
14 the Court.

15 22. This case arises out of Wal-Mart’s policy and practice of continuing to use
16 inaccessible POS devices that deny persons in wheelchairs and scooters equal access to the
17 benefits and services of its POS terminals and the benefits and services provided through its POS
18 terminals, at multiple Wal-Mart stores.

19 23. The claims of the Named Plaintiffs are typical of the claims of the class as a
20 whole because the Named Plaintiffs, or their members, are similarly affected by Defendant’s
21 failure to provide accessible POS terminals at multiple Wal-Mart stores.

22 24. The Named Plaintiffs are adequate class representatives because they, or their
23 members, are directly impacted by Defendant’s discrimination against them by failing to provide
24 accessible POS terminals at Wal-Mart stores. The interests of the Named Plaintiffs are not
25 antagonistic to, or in conflict with, the interests of the class as a whole. The attorneys
26 representing the class are experienced in representing clients with disabilities with class action
27 civil rights claims.

28

1 32. Most POS terminals in Wal-Mart stores are located at individual check stands at
2 the “front end” of the stores and are used for the vast majority of all customer transactions. POS
3 terminals allow customers to input sensitive and private information such as their Personal
4 Information Number (PIN); submit debit or credit card data by swiping a payment card; verify,
5 authorize or cancel a transaction; submit a signature; provide the consumer with the option to
6 select to receive cash-back from their account; select an amount of cash back to be provided; and
7 perform other affiliated tasks such as using coupons and authorizing charitable donations, which
8 involve inputting, correcting, cancelling or entering information that is personal or affects access
9 to personal information or resources. The POS terminals at multiple Wal-Mart locations are
10 mounted at inaccessible heights so that customers in wheelchairs or scooters cannot see the
11 display screens or reach the terminals. Wal-Mart has followed a uniform policy at many of its
12 stores of providing POS terminals at the front end of its stores that are positioned at a height and
13 in a manner that denies full and equal access to disabled customers in wheelchairs and scooters.

14 33. The POS terminals at Wal-Mart stores include a type of LCD (liquid crystal
15 display) or LED (light emitting diode) display, which provides information necessary to the
16 transaction in a visual format (hereafter “display screen”). To process their payments securely
17 and independently, customers generally need to be able to fully see the information displayed on
18 the POS screen.

19 34. As a result of the height and positioning of POS terminals at multiple Wal-Mart
20 locations, to successfully complete a transaction, many customers in wheelchairs and scooters
21 are forced to struggle with inaccessible equipment during the purchase/check-out process. Often,
22 customers with disabilities must stretch and strain just to try and see the information displayed
23 on these screens and enter the necessary PIN or sign for a credit card transaction. Often,
24 customers with disabilities cannot see all the information that is displayed. At times, customers
25 with disabilities cannot enter their PIN or sign their signatures without great difficulty if at all.
26 Conducting debit and credit card transactions requires many of these customers to request
27 assistance from cashiers to input information and/or provide signatures on their behalf.
28

1 35. The POS terminals at multiple Wal-Mart stores, as configured, cannot be adjusted
2 to provide access to those in wheelchairs and scooters. Customers in wheelchairs and scooters at
3 multiple Wal-Mart stores who attempt to adjust or move the POS terminals find great difficulty
4 in doing so. Moving the devices often requires twisting and pinching of wrists and arms. At
5 times, the force required to adjust the viewing angle of these devices is so great as to lead to the
6 devices breaking apart when disabled customers try to adjust them. This is highly embarrassing
7 for the customer with a disability.

8 36. Some customers with disabilities who do not wish to reveal private information to
9 cashiers or have cashiers sign on their behalf are completely precluded from using the POS
10 terminals at checkout stands at multiple Wal-Mart stores. These customers are required to either
11 use cash, which they may not wish to do for a variety of reasons, or leave the store without
12 purchasing any items.

13 37. At Wal-Mart stores, paper printouts are not available as an alternative method to
14 convey the information and provide the signature functions involved in a POS transaction.

15 38. The above-described facts create an ongoing, systemic pattern and practice of
16 discrimination against Wal-Mart customers who use wheelchairs or scooters. This
17 discrimination includes, *inter alia*: failing to ensure such individuals have full and equal access
18 to POS terminals so that they may independently and easily use credit or debit cards to conduct
19 transactions or take advantage of other services available at POS terminal when purchasing retail
20 goods.

21 39. In 2005, Disability Rights Education and Defense Fund (DREDF) contacted Wal-
22 Mart regarding the inaccessibility of the company's POS terminals and invited Wal-Mart to
23 participate in structured settlement negotiations to resolve DREDF's concerns. Wal-Mart
24 declined this invitation.

25 40. Prior to filing this lawsuit, counsel for Plaintiffs notified Wal-Mart by certified
26 mail of their continuing concern about the inaccessibility of the company's POS terminals at
27 multiple Wal-Mart stores and provided detailed information regarding their allegations of
28

1 continuing violations of federal and state nondiscrimination laws. Wal-Mart was provided with
2 the opportunity to resolve the matter without a lawsuit but Wal-Mart declined.

3 **EXPERIENCES OF NAMED PLAINTIFFS**

4 41. Plaintiff Janet Brown is a resident of Pittsburgh, California who is physically
5 disabled. Ms. Brown is a wheelchair user. Ms. Brown visits the Wal-Mart store located in
6 Pittsburgh, California once or twice a week. Ms. Brown cannot see the display screen of the
7 POS terminals at this store and therefore cannot see the prices of items or her total. Ms. Brown
8 prefers to use her debit card to purchase items, but requires cashier assistance to input her
9 confidential PIN.

10 42. Plaintiff Lisa Kilgore is a resident of San Pablo, California who is paraplegic.
11 Ms. Kilgore has used a wheelchair for 44 years. Ms. Kilgore shops at the Wal-Mart store located
12 in Richmond, California. Ms. Kilgore prefers to shop at Wal-Mart because of Wal-Mart's low
13 prices. Ms. Kilgore is not able to see the display screens of the POS terminals at this Wal-Mart
14 store because they are mounted too high. Despite the fact that Ms. Kilgore would prefer to use a
15 debit card to purchase items, she cannot privately enter her PIN into the POS terminals because
16 the display screens are mounted too high.

17 43. Plaintiff Center for Independent Living ("CIL") maintains headquarters in
18 Berkeley, California. CIL provides services, support and advocacy to enhance the rights and
19 abilities of people with disabilities to actively participate in their communities and lead self-
20 determined lives. CIL encourages people with disabilities to make their own choices and works
21 to open doors in the community to full participation and access for all. CIL's consumer services
22 give people with disabilities the tools and resources they need to achieve independence. All of
23 these services are free and feature advocacy, counseling, education and referrals.

24 44. CIL has had to divert its organizational resources due to Defendant's
25 discriminatory conduct. Among other things, CIL has expended staff time and resources
26 informing consumers with mobility disabilities of their rights and the responsibilities under the
27 ADA and state disability laws as consumers and Wal-Mart's obligation to provide equal access
28

1 to the benefits and services it provides to persons with disabilities. CIL has also diverted its
2 resources through prior unsuccessful efforts to convince Wal-Mart to fix the barriers at issue.

3 **FIRST CAUSE OF ACTION**

4 **Violation of Title III of the Americans with Disabilities Act**
5 **(42 U.S.C. § 12181 *et seq.*)**

6 45. Plaintiffs incorporate, by reference herein, the allegations in paragraphs 1 through
7 44, inclusive.

8 46. Title III of the ADA entitles disabled individuals to the full and equal enjoyment
9 of the goods, services, facilities, privileges, advantages, or accommodations of any place of
10 public accommodation. 42 U.S.C. § 12182(a).

11 47. Title III prohibits public accommodations from excluding an individual with a
12 disability or a class of individuals with disabilities on the basis of a disability or disabilities of
13 such individual or class, from participating in or benefiting from the goods, services, facilities,
14 privileges, advantages or accommodations of the entity or otherwise discriminating against a
15 person on the basis of disability. 42 U.S.C. § 12182(b)(1)(A)(i).

16 48. Title III prohibits public accommodations from affording an individual or class of
17 individuals with a disability, on the basis of a disability or disabilities of such individual or class,
18 with the opportunity to participate in or benefit from a good, service, facility, privilege,
19 advantage, or accommodation that is not equal to that afforded other individuals. 42 U.S.C. §
20 12182(b)(1)(A)(ii).

21 49. Title III prohibits public accommodations from providing an individual or class of
22 individuals, on the basis of a disability or disabilities of such individual or class, with a good,
23 service, facility, privilege, advantage, or accommodation that is different or separate from that
24 provided to other individuals. 42 U.S.C. § 12182(b)(1)(A)(iii).

25 50. Title III provides that goods, services, facilities, privileges, advantages, and
26 accommodations shall be afforded to an individual with a disability in the most integrated setting
27 appropriate to the needs of the individual. 42 U.S.C. § 12182(b)(1)(B).

28

1 51. Title III provides that an individual with a disability shall not be denied the
2 opportunity to participate in such programs or activities that are not separate or different. 42
3 U.S.C. § 12182(b)(1)(C).

4 52. Title III defines discrimination to include the failure of a public accommodation
5 to make reasonable modifications in policies, practices, or procedures, when such modifications
6 are necessary to afford such goods, services, facilities, privileges, advantages or accommodations
7 to individuals with disabilities; to take such steps as may be necessary to ensure that no
8 individual with a disability is excluded, denied services, segregated or otherwise treated
9 differently than other individuals because of the absence of auxiliary aids and services; and to
10 remove architectural barriers that are structural in nature, in existing facilities where such
11 removal is readily achievable. 42 U.S.C. §12182(b)(2)(A)(ii)-(iv).

12 53. Title III further defines discrimination as a public accommodation's failure to
13 design and construct facilities that are readily accessible to and usable by individuals with
14 disabilities (later than 30 months after July 26, 1990) and, with respect to a facility or part
15 thereof that is altered by, on behalf of, or for the use of an establishment in a manner that affects
16 or could affect the usability of the facility or part thereof, a failure to make alterations in such a
17 manner that, to the maximum extent feasible the altered portions of the facility are readily
18 accessible to and usable by individuals with disabilities. 42 U.S.C. § 12183(a)(1)-(2).

19 54. Wal-Mart is a place of public accommodation. *See* 42 U.S.C. § 12181(7)(E).

20 55. The Named Plaintiffs, and the constituency the organizational plaintiff CIL serves
21 are qualified individuals with disabilities within the meaning of the ADA.

22 56. Patrons of Wal-Mart stores with mobility disabilities who use wheelchairs and
23 scooters have been denied full and equal access to Wal-Mart's goods, service, facilities,
24 privileges, advantages, and accommodations. Defendant has failed to take sufficient steps to
25 remedy its discriminatory conduct. These violations are ongoing.

26 57. Defendant has violated Title III of the ADA by failing to make reasonable
27 modifications to its policies, practices, or procedures to ensure that POS terminals are accessible
28 to customers with mobility disabilities.

1 intentionally denies wheelchair and scooter users full and equal access to the accommodations,
2 advantages, facilities, privileges, and services that Defendant makes available to the non-disabled
3 public, in violation of the Unruh Civil Rights Act, California Civil Code §§ 51, *et seq.* These
4 violations are ongoing.

5 67. Defendant's discriminatory conduct alleged herein includes, *inter alia*, the
6 violation of the rights of persons with disabilities set forth in Title III of the ADA and therefore
7 also violates the Unruh Act. California Civil Code § 51(f).

8 68. The actions of Defendant have violated and continue to violate the Unruh Act and
9 therefore Plaintiffs are entitled to injunctive relief to remedy the discrimination.

10 69. Plaintiffs are also entitled to statutory minimum damages pursuant to California
11 Civil Code § 52 for each and every offense in violation of the Unruh Act. Ca. Civ. Code § 52(b).

12 WHEREFORE, Plaintiffs pray for relief as set forth below.

13 **THIRD CAUSE OF ACTION**

14 **Violation of the California Disabled Persons Act**
15 **(California Civil Code §§ 54-54.3)**

16 70. Plaintiffs incorporate, by reference herein, the allegations in paragraphs 1 through
17 44, inclusive.

18 71. The CDPA guarantees, *inter alia*, that persons with disabilities are entitled to full
19 and equal access, as other members of the general public, to accommodations, advantages,
20 facilities, and privileges of all "places of public accommodation" and "other places to which the
21 general public is invited" within the jurisdiction of the state of California. Cal. Civ. Code §
22 54.1(a)(1).

23 72. Defendant offers retail goods and services to the general public at a place of
24 public accommodation and in a place to which the general public is invited, within the
25 jurisdiction of the state of California, and therefore is obligated to comply with the following
26 provisions of the California Disabled Persons Act: California Civil Code §§ 54-54.3.

27 73. The CDPA provides, *inter alia*, that a violation of the ADA, 42 U.S.C. §§ 12101
28 *et seq.*, also constitutes a violation of the CDPA. Cal. Civ. Code § 54.1(d).

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1 California accessible to people with disabilities who use wheelchairs and scooters; 2) failing to
2 reasonably modify Wal-Mart's policies and procedures to provide POS terminals which are
3 accessible to people with disabilities who use wheelchairs and scooters; and 3) failing to remove
4 readily achievable barriers at POS terminals, for Plaintiffs and similarly situated individuals with
5 disabilities who use wheelchairs or scooters, as required by the ADA, Unruh Act and CDPA;

6 82. An order enjoining Defendant and its employees, agents, and any and all other
7 persons acting on Defendant's behalf or under Defendant's control from violating the ADA and
8 the Unruh Act;

9 83. A permanent injunction pursuant to the ADA and the Unruh Act requiring
10 Defendant to institute and implement policies and procedures that ensure that individuals in
11 wheelchairs or scooters have nondiscriminatory, full and equal independent access to POS
12 terminals so that they may use credit or debit cards to conduct non-cash transactions when
13 purchasing retail goods;

14 84. An order certifying this case as a class action under Fed. R. Civ. P. 23(a), and
15 23(b)(2) and/or 23(b)(3) appointing Plaintiffs as Class Representatives, and their attorneys as
16 Class Counsel;

17 85. Damages in an amount to be determined by proof, including all applicable
18 statutory damages; Cal. Civ. Code § 52(a); Cal. Civ. Code § 54.3.

19 86. An order awarding Plaintiffs reasonable attorneys' fees and costs, as authorized
20 by 42 U.S.C. § 12188, Cal. Civ. Code § 52 and Cal. Civ. Code § 54.3; and

21 87. For such other and further relief as the Court deems just and proper.

22
23 Dated: July 25, 2012

Respectfully Submitted,

DISABILITY RIGHTS ADVOCATES

25
26 By: 
27 Laurence W. Paradis
28 Kevin M. Knestrick
Christine Chuang

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