

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

OXFORD HOUSE, INC., a Delaware)
not-for-profit corporation and)
OXFORD HOUSE-AJANI, an unincorporated)
association)
)
Plaintiffs,)
)
v.)
)
Village of Woodridge of ILLINOIS,)
an Illinois municipal corporation)
)
)
Defendant.)

COMPLAINT

PRELIMINARY STATEMENT

This matter arises under the Fair Housing Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. § 3601 *et seq.* ("FHA"), and the Americans with Disabilities Act 42 U.S.C. § 12131, *et seq.* ("ADA"). Plaintiffs, Oxford House, Inc. ("Oxford House" or "OHI"), and Oxford House-Ajani, ("OH-Ajani") claim that Defendant, the Village of Woodridge, Illinois ("the Village " or "Woodridge"), interfered with OHI's operation and occupancy of dwellings for disabled persons recovering from alcoholism and drug addiction in violation of the FHA and ADA. The Village classified Oxford House properties as something other than single-family dwellings and applied its zoning code in a manner that interfered with Oxford House's ability to open and operate houses in the Village. The Village refused to provide a reasonable accommodation by waiving the limitation on the number of unrelated persons permitted to reside together.

Plaintiffs, OHI and OH-Ajani, seek damages and injunctive relief as redress for (1)The Village's disparate treatment of Plaintiffs through its actions and decisions; (2) Affirmative disability-based discrimination manifested in Defendant's acts and decisions; (3) Defendant's discriminatory refusal to provide Plaintiffs with a reasonable accommodation as required under federal anti-discrimination laws; and (4) Defendant's retaliation against Plaintiffs based on their protected class and protected activities. Defendant's actions above threaten Plaintiff's residents – who are disabled under the FHA and ADA – with impending eviction and fines through discriminatory means. To prevent these harms, Plaintiffs respectfully request this Honorable Court grant declaratory and injunctive relief to halt Defendant's discrimination based on handicap or disability in violation of the FHA and ADA. In addition, Plaintiffs seek compensatory and punitive damages, reasonable attorneys' fees, costs, and any other relief deemed appropriate by the Court.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1342, 42 U.S.C. § 3613, and 42 U.S.C. § 12133.
2. Declaratory and injunctive relief is sought pursuant to 42 U.S.C. § 3613(c)(1) and 42 U.S.C. § 12133, as well as Rules 57 and 65 of the Federal Rules of Civil Procedure.
3. Venue is properly located in this District pursuant to 28 U.S.C. § 1391 because a substantial part of the events and omissions giving rise to this complaint occurred within this District.

PARTIES

4. Oxford House, Inc. is a Delaware not-for-profit corporation with a principal place of business in Silver Spring, Maryland.

5. OHI serves as the umbrella organization for all individual Oxford Houses throughout the United States and holds exclusive authority to charter individual Oxford Houses.

6. OHI facilitates the establishment of affordable housing and provides support for individuals with disabilities, including individuals recovering from drug addiction and/or alcoholism. OHI is located at 6514 Maxwell Drive, Woodbridge, Illinois.

7. Oxford House-Ajani is an unincorporated association located at 6514 Maxwell Drive, Woodbridge, Illinois. OH-Ajani is comprised of seven unrelated individuals recovering from alcoholism and substance abuse who reside together under the Oxford House model.

8. All Oxford Houses are required to follow three rules. Each chartered Oxford House must (1) be financially self-supported, (2) be democratically run, and (3) any resident who relapses into drug or alcohol use must be immediately expelled.

9. The Village is a municipal corporation organized and existing under the laws of Illinois. The Village is responsible for the acts of its agents and employees, as well as for enforcing its zoning, building, and property maintenance codes. The Village is a public entity as defined under the Americans with Disabilities Act. 42 U.S.C. § 12131.

STATUTORY AND REGULATORY FRAMEWORK

10. In 1988, Congress amended the FHA to extend the guarantee of fair housing to handicapped individuals. Congress also authorized the Secretary of the United States Department of Housing and Urban Development to promulgate regulations to implement the FHA.

11. Under the FHA, a person is subject to a "handicap" if she or he has a "physical or mental impairment which substantially limits one or more of such person's major life activities, a record of such an impairment, or being regarded as having such an impairment." 42 U.S.C.

§ 3602(h). The term "physical or mental impairment" includes "alcoholism" and "drug addiction (other than addiction caused by current, illegal use of a controlled substance)." 24 C.F.R. § 100.201. The ADA uses similar terminology to define a "disability." *See, e.g., Tsombandis v. West Haven Fire Dept.*, 352 F.3d 565 (2d. Cir. 2003).

12. Under the FHA, it is unlawful to discriminate against, make unavailable, or deny a dwelling to any buyer or renter because of a handicap of that buyer, renter, or person residing in, or intending to reside in, that dwelling after it is sold, rented, or made available. 42 U.S.C. § 3604(f)(1).

13. The FHA further provides that it is unlawful to discriminate against any person in the terms, conditions, or privileges of the sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, based on a handicap of such person residing in or intending to reside in that dwelling after it is sold, rented, or otherwise made available. 42 U.S.C. § 3604(f)(2).

14. The federal regulations implementing the FHA define discriminatory activity and prohibit the provision of municipal services in a different manner as based on a handicap. 24 C.F.R. § 100.70(d)(4).

15. The federal regulations implementing the FHA further make it unlawful "to restrict or attempt to restrict the choices of a person by word or conduct in connection with seeking, negotiating for, buying or renting a dwelling so as to . . . discourage or obstruct choices in a community, neighborhood or development" because of a handicap. 24 C.F.R. § 100.70(a).

16. The FHA also contains an Anti-Retaliation provision that makes it unlawful "to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his having exercised or enjoyed, . . . any right granted or protected by [the FHA]. 42

U.S.C. § 3617.

17. Similarly, the Americans with Disabilities Act, passed by Congress in 1990, seeks to eradicate discrimination on the basis of disability in all areas of public life, as well as private employment. 42 U.S.C. § 12101. Its purpose is "to assure equality of opportunity, full participation, independent living, and economic self-sufficiency" for people with disabilities. 42 U.S.C. § 12101(a)(8).

18. The ADA requires that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in, or be denied the benefits of, the services, programs, or activities of a public entity, nor be subjected to discrimination by any municipal entity. 42 U.S.C. § 12132.

19. The federal regulations implementing the ADA prohibit a public entity from administering a licensing program or establishing certain requirements for the activities of a licensee in a manner that subjects qualified disabled individuals to discrimination on the basis of their disability. 28 C.F.R. § 35.130(6).

20. The federal regulations implementing the ADA also make it unlawful for a public entity, in determining the site or location of a facility, to make selections that have the purpose or effect of excluding individuals with disabilities, denying them the benefits of certain locations, or otherwise subjecting them to discrimination. 28 C.F.R. § 35.130(4)(I).

21. These statutes and their regulations prohibit discrimination against people with disabilities by governmental entities delivering services in connection with housing where such persons with disabilities live or intend to live. They also require that such entities provide reasonable accommodations for people with disabilities. 42 U.S.C. § 3604(f)(1), (2), (3); 42 U.S.C. 12132.

STATEMENT OF FACTS COMMON TO ALL COUNTS

Oxford House History

22. Oxford House strives to provide individuals in recovery from alcoholism and drug addictions the opportunity to develop comfortable sobriety without relapse.

23. In keeping with this mission, Oxford House opened its first home in 1975 to assist individuals recovering from alcohol and drug addiction.

24. Today, each house represents a remarkably effective and low-cost method of preventing relapse. The purpose of the first Oxford House, established in 1975, remains the same and is served day by day, house after house, in each of nearly 4000 houses in the United States.

Oxford House Residents

25. All past and present Oxford House residents are individuals with the disability of Substance Use Disorder ("SUD").

26. SUD is a disease that affects a person's brain and behavior, leading to an inability to control the use of drugs or alcohol.

27. Because of their disability, all past and present residents of Oxford House have difficulty caring for themselves and sustaining healthy relationships with friends and family.

28. SUD impacts Oxford House residents' decision-making processes, as well as their ability to concentrate and stay on task.

29. While treatment eventually helps ameliorate SUD symptoms, the underlying disease never disappears.

30. Without structure, accountability, and support, the relapse rate for individuals with SUD is significant. .

31. Even though Oxford House residents must be sober to reside in any Oxford home, their underlying addictions substantially limit their ability to live independently without relapsing.

32. Residents live in Oxford homes because they do not want to relapse into drug or alcohol use.

33. The length of each resident's stay depends on the resident's continued need for supported living; however, there is no limit on how long an Oxford House resident can reside in an Oxford House.

34. Oxford House enables residents to recover from alcoholism and substance abuse at their own pace, which ameliorates the effects of the disease.

35. Oxford House residents are vital to each other's sobriety. They eat together, go out together, attend meetings, and learn living tools to help them transition out of the sober home and back into their communities.

Oxford House Model

36. Oxford Houses are individually self-run, self-supporting homes for individuals recovering from alcoholism and drug addiction. Residents live together in a family-like environment.

37. Oxford Houses do not provide treatment, counseling, therapy, or other services. There is no house manager, paid staff, or personnel involved in the supervision or management of the house.

38. Residents govern themselves democratically by voting on officers (specifically, president, vice president, treasurer, coordinator, comptroller, and secretary) and holding regular house meetings to decide on matters such as chores and who moves in or out.

39. Oxford Houses are also financially self-supporting. Residents pay their pro rata share

of rent and utilities each month to the house treasurer, who then pays the house bills.

40. Oxford Houses do not receive outside funding or pay expenses beyond rent and utilities.

41. All Oxford Houses adopt their own name and use the house name for their lease, utility, and bank accounts. Residents pay rent directly to the landlord through the house checking account, which is also used to pay all utilities and common household expenses.

42. All Oxford Houses lease their homes from the property owner through a standard residential lease.

43. Residents live as any other group of unrelated persons functioning as a single housekeeping unit. They share all household responsibilities and generally live two to a bedroom.

44. The quality and nature of the relationship among residents are akin to those of a family, providing the emotional and mutual support needed for their recovery.

45. By living with other people in recovery, residents never have to face a recovering person's deadliest enemies: loneliness and isolation.

46. The residents' recovery process requires living in a structured, safe, and therapeutic environment.

47. Residents of each Oxford House have access to the entire house and all household facilities, living as any other group of unrelated persons functioning as a single housekeeping unit. There are no special locks on bedroom doors.

48. Residents of each house share all household responsibilities. They live together purposefully to create a "family" atmosphere, sharing all aspects of domestic life.

Village of Woodbridge Zoning Code

49. OH-Ajani, located at 6415 Maxwell Drive, Woodbridge, Illinois, is located in the Village's R-1 zoning District.

50. Purpose: The R-1 Residential District provides standards for larger-lot, single-unit housing opportunities in the Village. The district aims to preserve environmental features, such as the tree canopy within Woodbridge, and accommodates recreational and community-serving uses that are located on large properties.

51. Permitted uses in the R-1 zoning district include Community Residences.

52. The Village's zoning code defines family as:

- a. A person living alone;
- b. Two (2) or more persons related by blood, marriage or adoption (including foster children) living together as a housekeeping unit and occupying a single dwelling unit;
- c. A group of not more than five (5) persons, who need not be related by blood, marriage or adoption (including foster children) living together as a housekeeping unit by joint agreement; or
- d. A group of four or more persons living in a community residence.

53. The Village's zoning code defines Community Residence as:

A dwelling unit shared by not more than twelve (12) persons not related by blood, marriage, adoption or guardianship, plus their related staff, who live together as a single housekeeping unit and in a long-term family environment in which staff persons assist in providing care, education, and participation, on in community activities for the residents with the primary goal of enabling the residents to live as independently as possible in order to reach their maximum potential. A group home may be shared by groups such as the disabled or the elderly.

Woodridge Oxford Houses

54. In 2021, Illinois contracted with Oxford House to open Oxford Houses in the state. There are approximately 107 Oxford Houses in Illinois.

55. The contract's purpose was to supply a cost-effective means of providing a disciplined, supportive, open-ended, alcohol—and drug-free environment for recovering individuals.

56. Oxford Houses serve men and women with a history of drug and/or alcohol addiction who have either completed a detoxification program or short-term substance abuse treatment or have been discharged from a correctional facility.

57. Oxford House opened two (2) homes in Woodridge from 2022 to the present: 6514 Maxwell Drive and 6328 Halsey Drive.

58. In August 2022, Oxford House-Ajani rented 6514 Maxwell Drive from Fender Properties 2, LLC, as an Oxford House for a maximum of eleven men recovering from alcoholism and drug addiction.

59. 6514 Maxwell Drive is in a single-family zoning district in Woodridge.

Critical Mass

60. Oxford House, Inc. has provided housing for recovering alcoholics and substance abusers since 1977. Based on this experience, for the optimal outcomes in ensuring long-term recovery, Oxford House has learned that the optimal number of residents per house is between 8-12 residents.

61. 6514 Maxwell Drive requires eleven residents to reach the critical mass necessary to achieve the therapeutic benefits of a recovery home.

62. Achieving the critical mass of residents provides greater opportunities for social connections, which sustain recovery and decreases the risk of relapse.

63. The number of residents required to reach a critical mass depends on the size of each home.

64. Each resident comes to OHI with their own experiences and personality. Operating a program at critical mass increases the likelihood that the residents will find another program member with whom they can connect. This connection is critical to preventing isolation, which can lead to relapse.

65. Filling the home to its critical mass of at least eleven residents mitigates the concern that any particular resident will find themselves at home alone or disengaged and at risk of relapse.

66. For the program to function optimally, the residents must share a room to ensure accountability, social integration, and relapse prevention.

Woodridge's Code Enforcement Activities

67. On or about January 16, 2024, the Village sent a notice of violation to the owner of 6514 Maxwell Drive, Fender Properties 2, stating that the use of the property as an Oxford House was in violation of the Village's zoning code.

68. The notice of violation, in the form of a letter, advised Fender Properties that a group home was being operated in violation of the Village's zoning ordinances.

69. The letter further stated that more than five (5) unrelated persons resided in the house, in violation of the Village's definition of family.

70. The letter also stated that the owner failed to comply with the Village's Crime-Free Housing Seminar.

71. On or about March 11, 2024, the Village issued a citation to appear in the Circuit Court for the Eighteenth Judicial Circuit to Fender Properties for having more than five (5) unrelated persons residing in a single-family dwelling.

72. On or about May 31, 2024, an attorney for Oxford House sent Karen Byrne, Village of Woodridge Code Enforcement Officer, a letter on behalf of Oxford House, Fender Properties 2, LLC, and the residents of Oxford House-Ajani. The letter requested that the Village make a reasonable accommodation under the Fair Housing Act by waiving the limit on the number of unrelated persons that could reside together as a family. OHI also requested the Village treat the use of 6514 Maxwell Drive as single-family use and the residents as the functional equivalent of a family.

73. On or about August 41, 2024, an attorney from the Village's outside law firm responded to the reasonable accommodation request.

74. The letter denied Oxford House's reasonable accommodation request. The basis for the denial was that there would be no amelioration of the effects of alcoholism and drug addiction by having more than five (5) residents.

75. The letter did not provide a means to appeal the decision.

CLAIMS FOR RELIEF

COUNT ONE: DISCRIMINATION UNDER THE FHA

76. Plaintiffs reallege and incorporate herein by references the foregoing paragraphs of this complaint.

77. The residents of Oxford Houses are persons recovering from alcoholism or drug addiction who no longer use alcohol or drugs, and as such, are persons with a disability within the

meaning of the 42 U.S.C. § 3602(h) and 42 U.S.C. § 12132.

78. The Oxford Houses are considered "dwellings" as defined by 42 U.S.C. § 3602(b).

79. OHI, the Oxford Houses, and their past, current, and future residents qualify as "aggrieved person(s)" as defined in 42 U.S.C. § 3602(i) and have suffered damages as a result of the Village 's discriminatory conduct.

80. The Village is a "public entity" within the meaning of 42 U.S.C. § 12131(1).

81. The Village's actions amount to a denial or exclusion related to a "program or activity" within the meaning of 42 U.S.C. §12131(2). The effect of Defendant's actions has been to prevent residents of Oxford Houses from residing at the dwelling of their choice or in any other home zoned for single-family use in the Village.

82. The effect of Defendant's actions has been to prevent residents of Oxford Houses from residing at the dwelling of their choice or in any other home zoned for single-family use in the Village.

83. The Village's conduct has effectively denied necessary housing opportunities to recovering alcoholics and substance abusers.

84. The effect of the conduct of the Village is to limit the housing opportunities of unrelated disabled persons by denying them the right to live together in any residential zoning district within the Village.

85. The Village is treating the residents of the aforementioned dwellings in a discriminatory fashion.

86. The Village is imposing far more stringent fire, zoning, building, property maintenance, and land use requirements on this group of unrelated disabled individuals living

together than it imposes upon individuals living together who are related by blood or marriage or other groups of unrelated non-disabled persons.

87. By arbitrarily and illegally classifying the premises described as something other than single-family homes, the Village is making single-family housing unavailable to persons recovering from drug and alcohol addiction who reside in dwellings that are neither state-licensed nor supervised.

88. The Village has acted under the color of state law in failing to affirmatively further fair housing in its code enforcement activities with the purpose and effect of discriminating against Oxford House residents based on their disabilities. The Village has applied its codes so as to deny Oxford House and its residents the residential opportunities available to persons related by blood, marriage, adoption, or other groups of similarly situated, unrelated, non-disabled persons.

89. Oxford House residents live in fear of losing their homes, suffering anxiety, emotional distress, pain, setbacks in their recovery efforts, and other irreparable harm due to the Village's actions. They have no adequate remedy at law.

90. The Village arbitrarily classified the premises occupied by Oxford House residents as something other than single-family homes and is using its municipal powers to force residents from residential zones. This conduct amounts to a denial of due process.

91. The Village failed to affirmatively further fair housing in the administration and application of its zoning, building, property maintenance, and life safety codes.

92. The Village utilized its municipal services to threaten, intimidate, harass, and coerce the Plaintiffs after they have exercised their rights under the Fair Housing Act.

93. The Village is intentionally and maliciously harassing, intimidating, and interfering

with Oxford House and persons associated with Oxford House to prevent Oxford Houses from existing in single-family neighborhoods.

94. The Village's above-described conduct was taken on the basis of the disability status of Oxford Houses residents, in violation of 42 U.S.C. §§ 3604(f)(1) and (f)(2).

78. The Village's unlawful actions and practices described above constitute an ongoing, continuing pattern or practice of discrimination under 42 U.S.C. § 3604(f).

**COUNT TWO: FAILURE TO GRANT A REASONABLE ACCOMMODATION UNDER
THE FHA**

79. Plaintiffs reallege and incorporate herein by references the foregoing paragraphs of this Complaint.

80. OHI has made numerous requests for the Village to grant OHI, the Oxford Houses, and their residents, a reasonable accommodation from its policies, procedures, rules, and ordinances so that Oxford Houses may continue to operate in the Village with their current number of residents in each house, at their respective locations, and without sprinkler systems.

81. The requested accommodation is necessary because of the disabilities of the residents and would result in a direct ameliorative benefit to the residents of their disabilities.

82. The requested accommodation is reasonable because it does not impose an undue burden or fundamental alteration of any Village program, code, or regulation.

83. Without a reasonable accommodation, the Village's limitation on the number of residents per Oxford House makes it impossible for the Oxford Houses to operate under the Oxford House model and harms the residents' recovery efforts.

84. Despite the necessity of the requested accommodation and the lack of any undue financial and administrative burden or fundamental alteration of any Village programs, the Village

denied OHI's requests for a reasonable accommodation.

85. The Village 's refusal to make a reasonable accommodation in its rules, policies, practices, or services- accommodations necessary to afford OHI, the Oxford Houses, and their residents an equal opportunity to use and enjoy housing- is a violation of 42 U.S.C. § 3604(f)(3)(B).

86. The Village 's conduct was intentional and demonstrated a disregard for the rights of others.

COUNT THREE: RETALIATION UNDER THE FHA

87. Plaintiffs reallege and incorporate herein by reference the foregoing paragraphs of this Complaint.

88. Defendant is violating Plaintiff's rights under the FHA and its implementing regulations by retaliating against Plaintiff because of the protected class status of its residents and their exercise of legal rights under the FHA after Plaintiff asserted its Fair Housing rights.

COUNT FOUR: DISCRIMINATION UNDER THE ADA

89. Plaintiffs reallege and incorporate herein by reference the foregoing paragraphs of this Complaint.

90. Plaintiff OHI is involved in the process of providing housing to people with disabilities as defined in 42 U.S.C. § 12102(2).

91. Plaintiff's residents are individuals with disabilities, as defined in 42 U.S.C. § 12102(2), living at the Oxford Houses.

92. Defendant is a public entity, within the definition of 42 U.S.C. § 12131(1).

93. The actions of Defendant violate Plaintiff and its residents' rights under the ADA and the regulations promulgated thereunder by:

- a. Denying the individual disabled residents the opportunity to participate in or benefit from the supportive housing program OHI offers;
- b. Using and administering land use ordinances with the purpose and effect of subjecting Plaintiff and its residents to discrimination based on their disability;
- c. Subjecting Plaintiff and its residents to discrimination on the basis of their disability;
- d. Denying disabled residents the opportunity to participate in a program in the most integrated setting appropriate to their needs in a manner discriminatory to Plaintiff and different from the opportunities presented to non-disabled individuals;
- e. Utilizing licensing and permit requirements to enforce the Code and deny Plaintiff's residents the enjoyment of rights, privileges, advantages, and opportunities enjoyed by non-disabled individuals in a discriminatory manner.

COUNT FIVE: FAILURE TO GRANT A REASONABLE ACCOMMODATION UNDER THE ADA

94. Plaintiffs reallege and incorporate herein the foregoing paragraphs of this Complaint.
95. OHI has made numerous requests that the Village grant it, the Oxford Houses, and their residents a reasonable accommodation from its policies, procedures, rules, and ordinances so that the Oxford Houses may continue to operate in the Village with their current number of residents in each house, at their respective locations, and without sprinkler systems.
96. The requested accommodation is necessary because of the disabilities of the residents and would result in a direct ameliorative benefit to the residents of their disabilities.
97. The requested accommodation is reasonable because there is no undue burden or fundamental alteration of any Village program, code, or regulation.

98. Without a reasonable accommodation, the Village 's limitation on the number of residents at the Oxford Houses makes the operation of the Oxford Houses impossible under the Oxford House model and is deleterious to the residents' recovery.

99. Despite the necessity of the requested accommodation and the lack of any undue financial and administrative burden, or fundamental alteration of any Village program, the Village denied OHI's requests for a reasonable accommodation.

100. The Village's refusal to make a reasonable accommodation in its rules, policies, practices, or services, which is necessary to afford OHI, the Oxford Houses, and their residents an equal opportunity to use and enjoy housing, is a violation of 42 U.S.C. § 12132.

101. The Village's conduct was intentional and in disregard of the rights of others.

PRAYER FOR RELIEF

WHEREFORE, to remedy Defendant's illegal actions outlined in all the claims above, Plaintiffs pray that this Court enter an ORDER:

a. Declaring the Defendant's actions constitute violations of the Fair Housing Act, 42 U.S.C. § 3601, et seq. and the Americans with Disabilities Act, 42 U.S.C. § 12131, et seq.

b. Enjoining the Defendant, its departments, commissions, boards, councils, agents, employees, assigns and all other persons in active concert or participation with it, from violating any provision of the Fair Housing Act, 42 U.S.C. § 3601, et seq. and the Americans with Disabilities Act, 42 U.S.C. § 12131, et seq.

c. Requiring Defendant to grant the Oxford Houses all necessary permits or other permissions to operate the Oxford Houses in the Village, and enjoins Defendant, its departments, commissions, boards, councils, agents, employees, assigns and all other persons in

active concert or participation with it, from otherwise interfering with these Oxford Houses at their present locations, with the requested number of residents, and without fire sprinkler systems.

d. Requiring Defendant to take such affirmative steps as may be necessary to eliminate the effects of Defendant's unlawful practices described herein and put the Plaintiff in the position it would have been but for Defendant's discriminatory conduct pursuant to 42 U.S.C. § 3613(c)(1).

e. Awarding Plaintiffs such damages as would fully compensate them for their injuries caused by Defendant's violations, including compensatory and punitive damages, pursuant to 42 U.S.C. § 3613(c)(1).

f. Awarding Plaintiffs their costs, expenses, and attorney's fees pursuant to 42 U.S.C. § 3613(c)(2), and 42 U.S.C. § 12133; and

7. Granting any additional relief as the Court deems just and proper.

JURY DEMAND

Pursuant to Rule 28 of the Federal Rules of Civil Procedure, Plaintiffs respectfully request a trial by jury of all issues triable by a jury.

Respectfully submitted,

Dated: Thursday, December 12, 2024

/s/ Sarah Jane Hunt

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