

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MELISSA WEISS,
c/o EVERSHEDS SUTHERLAND (US) LLP
700 Sixth Street, NW, Suite 700
Washington, DC 20001

Plaintiff,

v.

DISTRICT OF COLUMBIA
400 6th Street, NW,
Washington, D.C. 20001,

Defendant.

Case No. 1:26-cv-2662

COMPLAINT

JURY TRIAL DEMANDED

COMPLAINT AND JURY DEMAND

NATURE OF THE ACTION

1. Plaintiff Melissa Weiss works as a Digital Navigator at the Martin Luther King Jr. Memorial Library (“MLK Library”) in the District of Columbia. Ms. Weiss has spastic cerebral palsy and uses a motorized wheelchair. She brings this lawsuit because her employer, DC Public Library (“DCPL”), has failed to provide reasonable accommodations for her disability despite her repeated requests. Over a four-year period, DCPL delayed and failed to install automatic door openers or adjust the tension on heavy doors to allow Ms. Weiss to safely navigate her workplace, in violation of Title I of the Americans with Disabilities Act (“ADA”), Section 504 of the Rehabilitation Act (“Section 504”), and the D.C. Human Rights Act (“DCHRA”).

2. At the outset of her employment, Ms. Weiss informed DCPL that she had difficulty navigating her workspace at MLK Library because opening several heavy and hard-to-reach doors from her wheelchair caused her physical strain and damage to her wheelchair. Within the first month of her employment, Ms. Weiss requested a reasonable accommodation to install

automatic door openers or adjust the pressure of several doors at MLK Library to allow her to safely navigate the library and do her job.

3. Notably, MLK Library houses the DCPL Center for Accessibility. The Center is purportedly designed to provide equal access to library resources for patrons with disabilities and educate the community through disability-related programming. However, when MLK Library underwent a recent multimillion-dollar renovation project, the 2010 ADA Standards for Accessible Design¹ were not followed, resulting in heavy doors that are inaccessible for Ms. Weiss (and other employees and patrons).

4. The ADA and EEOC regulations require employers to provide reasonable accommodations to employees so that they may enjoy equal benefits and privileges of their employment similar to their coworkers without disabilities. *See* 42 U.S.C. § 12111(9); 29 C.F.R. § 1630.2(o)(1)(iii).

5. By failing to install automatic door openers and/or reduce the pressure of doors in compliance with ADA standards for the doors Ms. Weiss must use to access her workplace, DCPL has denied her the same basic workplace access afforded to employees without disabilities.

6. In April 2026, the EEOC found reasonable cause to conclude that DCPL discriminated against Ms. Weiss by failing to provide accessible doors in her workplace because the evidence showed the inaccessible workplace doors at DCPL prevented her from enjoying the full terms, conditions, and privileges of her employment.

¹ State and local government facilities must follow the requirements of the 2010 ADA Standards for Accessible Design, which incorporate the Title II regulations at 28 CFR § 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines.

7. Unlike employees without disabilities, who enjoy freedom of movement throughout their workplace, Ms. Weiss must navigate her workplace like a maze, avoiding inaccessible pathways and searching for the route least likely to injure her or damage her wheelchair.

8. To simply reach her desk, restrooms, and staff areas, Ms. Weiss has endured being hit by heavy and hard-to-reach manual doors, injuring herself and damaging her wheelchair. These injuries include muscle strains, exacerbation of elbow and hip pain, bruising from door handles, and soft-tissue flare-ups under her ribs. In addition to physical injuries, DCPL's inaction has caused Ms. Weiss anxiety, frustration, and stress daily.

9. By failing to provide reasonable accommodations to Ms. Weiss, the District of Columbia has violated and continues to violate Title I of the ADA, Section 504, and the DCHRA.

10. Ms. Weiss seeks, among other forms of relief, a declaratory judgment finding that she was deprived of reasonable accommodations, compensatory and punitive damages, and a permanent injunction enjoining DCPL from engaging in employment practices that discriminate on the basis of disability, requiring DCPL to bring the doors at issue in this complaint into compliance with the ADA, and requiring DCPL to implement or update policies and procedures for receiving, evaluating, documenting, and responding to requests for reasonable accommodation that will prevent recurrence of the violations experienced by Ms. Weiss.

JURISDICTION AND VENUE

11. This action is brought under Title I of the Americans with Disabilities Act, 42 U.S.C. § 12111 *et seq.*, Section 504 of the Rehabilitation Act, 29 U.S.C. § 794, and the DC Human Rights Act, D.C. Code § 2-1401.01, *et seq.*

12. This Court has subject-matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1343 for claims arising under the ADA and Section 504.

13. Ms. Weiss has exhausted her administrative remedies and received a Notice of Right to Sue. 42 U.S.C. § 12117.

14. This Court has supplemental jurisdiction over the DCHRA claim, as it arises out of the same nucleus of operative facts. 28 U.S.C. § 1367.

15. This Court has personal jurisdiction over Defendant because Defendant's primary place of business is in the District of Columbia, and the acts and injuries complained of herein occurred in the District of Columbia.

16. Venue is proper in this District under 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3) because Ms. Weiss is employed by DCPL in the District of Columbia, and the District of Columbia is where violations of law at issue in this case occurred and where Ms. Weiss's personnel records are maintained.

PARTIES

17. Plaintiff Melissa Weiss is an individual with spastic cerebral palsy who uses a motorized wheelchair for mobility. Ms. Weiss is a qualified individual with a disability under the ADA, Section 504, and the DCHRA. Ms. Weiss is a resident of the District of Columbia and an employee at MLK Library, the central library within the DCPL system. Ms. Weiss can perform the essential functions of her employment with or without reasonable accommodations.

18. Defendant District of Columbia ("the District"), through its agency DCPL, is a public entity responsible for providing educational, community, and cultural resources to residents of the District and employs over 15 employees. The District is a recipient of federal financial assistance under Section 504 of the Rehabilitation Act. In each fiscal year, through 2026, DCPL has received federal funds. Because DCPL receives federal funds, the District must

comply with the requirements of Section 504. The District is also responsible for complying with the ADA and the DCHRA.

FACTUAL ALLEGATIONS

19. Ms. Weiss has spastic cerebral palsy, which substantially limits her motor coordination and her ability to walk independently. Because of her disability, Ms. Weiss uses a motorized wheelchair.

20. Throughout her life, Ms. Weiss has repeatedly encountered doors at workplaces and schools that were inaccessible and limited her independence. Because of this, she acquired specialized knowledge about door features, such as automatic doors, and grew accustomed to checking if doors had potential automatic opening capabilities. To ensure she is afforded the same opportunity and access as her peers without disabilities, Ms. Weiss developed a strong understanding of her rights under the ADA and became a strong self-advocate.

21. Because Ms. Weiss uses a wheelchair for mobility, she requires doors that either have automatic door openers or that have low door pressures, easy-to-reach and operate handles, and slow closing speed that allow her to open and get through them without strain or being hit. When Ms. Weiss approaches a door, she must consider its opening direction, the pressure of the door, its door handle location, and potential closing speed to figure out the best way to navigate through without injury.

22. Due to Ms. Weiss's disability, it is important that she maintains good posture and sits properly in her wheelchair with her seatbelt fastened. Otherwise, she risks injuries, physical strain, and stress that could affect her ability to work and live independently.

23. When she must open a manual door that is difficult to reach from her wheelchair, she must unbuckle her seatbelt. She may have to reach across her body to open the door, hold the door with her arm and foot, and maneuver her front wheels into the doorway to prevent the door

from closing. She then slowly steers through the door. As she moves through a doorway, the door's weight may push back against her, dropped items may block her path, and the door latch may scratch her arm, making it more difficult to pass through safely.

24. When Ms. Weiss must open a manual door that requires more than five pounds of force, it will strain her shoulders, wrists, and hands, and can aggravate the soft tissue between and under her right ribs.

25. When Ms. Weiss must open a manual door with a push bar, she must use equal pressure with both hands to open it. If the door is not pushed in the exact right spot, it sticks and requires more force to open, which strains Ms. Weiss's muscles.

26. When a manual door is recessed, it adds an additional barrier to Ms. Weiss's ability to safely navigate the door.

27. When a manual door requires a card-swipe function to allow only staff members to pass through it, Ms. Weiss must coordinate the difficulty of swiping, opening the door, and navigating through safely.

28. When there is a combination of the above factors, such as a recessed card-swipe door with a push bar, it becomes nearly impossible for Ms. Weiss to navigate through the door without incident.

29. Opening and navigating through manual doors in MLK Library exacerbates Ms. Weiss's disability due to the injuries, physical strain, and stress she endures on a daily basis.

30. In May 2022, Ms. Weiss was hired as a part-time Digital Navigator at MLK Library. In August 2022, her position was converted to full-time. Ms. Weiss's responsibilities include providing professional assistance to patrons at the library by assisting them with building digital skills and troubleshooting technological issues.

31. In her role, Ms. Weiss often provides one-on-one technology support to patrons, including answering questions, teaching new digital skills or software, setting up new devices, troubleshooting printing issues, and assisting with tasks such as uploading documents. Ms. Weiss loves being a Digital Navigator because it combines her passion for teaching with her technical knowledge.

32. During her onboarding, Ms. Weiss notified DCPL about her disability on the District of Columbia Employment Applicant Identification Sheet and indicated that her disability requires special working conditions. She also provided two letters to the DC Human Resources Department from her doctor stating that she has cerebral palsy, which can impair her motor coordination.

33. Prior to Ms. Weiss's employment, MLK Library underwent a multi-year, \$211 million renovation project to transform the flagship library. When MLK Library reopened in September 2020, renovations included the addition of the rooftop terrace, a new entryway, conference and meeting rooms, and a redesigned Center for Accessibility.

34. In the time period relevant to this Complaint, from FY2021 to FY2026, DCPL's operating budget increased from \$73 million to \$85 million.²

35. Despite DCPL's growing budget and its stated commitment to serving people with disabilities, for four years it has delayed and failed to provide an accessible workplace for Ms. Weiss.

² DCPL's operating budget for FY2024 was over \$76 million dollars and increased by 2.8% to over \$78 million dollars in FY2025. The DCPL FY2025 approved budget included \$4.75 million for General Improvements to libraries district-wide, including a focus on "ADA code compliance for restrooms and elevators." It further included \$886,000 dedicated to improvements for MLK Library.

INACCESSIBLE DOORS AT MLK LIBRARY

36. Soon after beginning her employment in May 2022, Ms. Weiss discovered that she could not safely and independently navigate her workplace in her wheelchair. Throughout MLK Library, she repeatedly encountered heavy, closed doors that lacked automatic door openers. The lack of accessible doors made Ms. Weiss feel anxious and unwelcome at her workplace and increased her risk of physical injury.

37. Through conversations with coworkers, Ms. Weiss learned that all reasonable accommodation requests, both for library employees and patrons, were funneled through an online form to the Center for Accessibility. The Center for Accessibility's staff were neither trained to process such requests nor aware that they were responsible for this duty. Ms. Weiss did not complete the form and raised her concerns to the DCPL Executive Director who agreed the process needed to be revisited.

38. Later, Ms. Weiss searched the DCPL Human Resources employee portal for information on DCPL's process for requesting reasonable accommodations, but the section of the website titled "Americans with Disabilities Act (ADA)" led to a blank page.

39. Ms. Weiss contacted the DCPL ADA Coordinator when it became apparent that the vast majority of doors in the building were inaccessible and would likely cause her injury.

40. By May 12, 2022, at the latest, MLK Library was on notice that doors in public and staff areas were inaccessible. The District's Office of Disability Rights ("ODR") conducted accessibility surveys of MLK Library at least three times—in May 2022, June 2022, and August 2022—and found that the doors generally were inaccessible because they were too heavy to operate. Specifically, the doors were in violation of the 2010 ADA Standards for Accessible

Design, which provides that interior doors must open with no more than five pounds of force.³ Both the June 2022 and August 2022 accessibility surveys were conducted as a result of Ms. Weiss's advocacy.

41. Because Ms. Weiss was unable to use the manual doors safely, she requested a reasonable accommodation and asked DCPL to make various doors throughout her workplace accessible.

42. Ms. Weiss reiterated her need for accessible doors in her workplace after she received a new wheelchair in April 2023. Her new chair had a deeper seat and longer footplates, which positioned her farther from doors and made it even harder for her to manually open the heavy and hard-to-reach doors.

43. For the past four years, Ms. Weiss has used her advocacy skills and repeatedly followed up with the DCPL ADA Coordinator, her supervisor, the DCPL Human Resources Director ("DCPL HR Director"), and/or the MLK Library Director to reiterate and seek updates with respect to her accommodation requests. When her advocacy with DCPL did not yield results, she sought guidance and assistance from ODR.

44. On at least four different occasions, in June 2022, August 2022, May 2023, and June 2023, Ms. Weiss demonstrated to the DCPL HR Director, DCPL ADA Coordinator, and/or the MLK Library Director her difficulty manually opening heavy and hard-to-reach doors without an automatic door opener. Ms. Weiss discussed and showed them the doors along her main routes in the MLK Library that were too heavy or too hard to reach and navigate through.

³ See 2004 Americans with Disabilities Act Accessibility Guidelines, Chapter 4, § 404.2.9 ("The force for pushing or pulling open a door or gate other than fire doors shall be . . . 5 pounds maximum.").

45. Despite these efforts, and as described below, DCPL has never fully implemented the accommodations she needs to enjoy equal benefits and privileges of her employment as certain areas in Ms. Weiss's workplace remain inaccessible to her.

46. The graph below illustrates DCPL's sustained failures to provide reasonable accommodations by showing, in red, the timespan during Ms. Weiss's employment in which each of MLK's Library doors remained unautomated and/or the tension was not reduced to ADA standards.

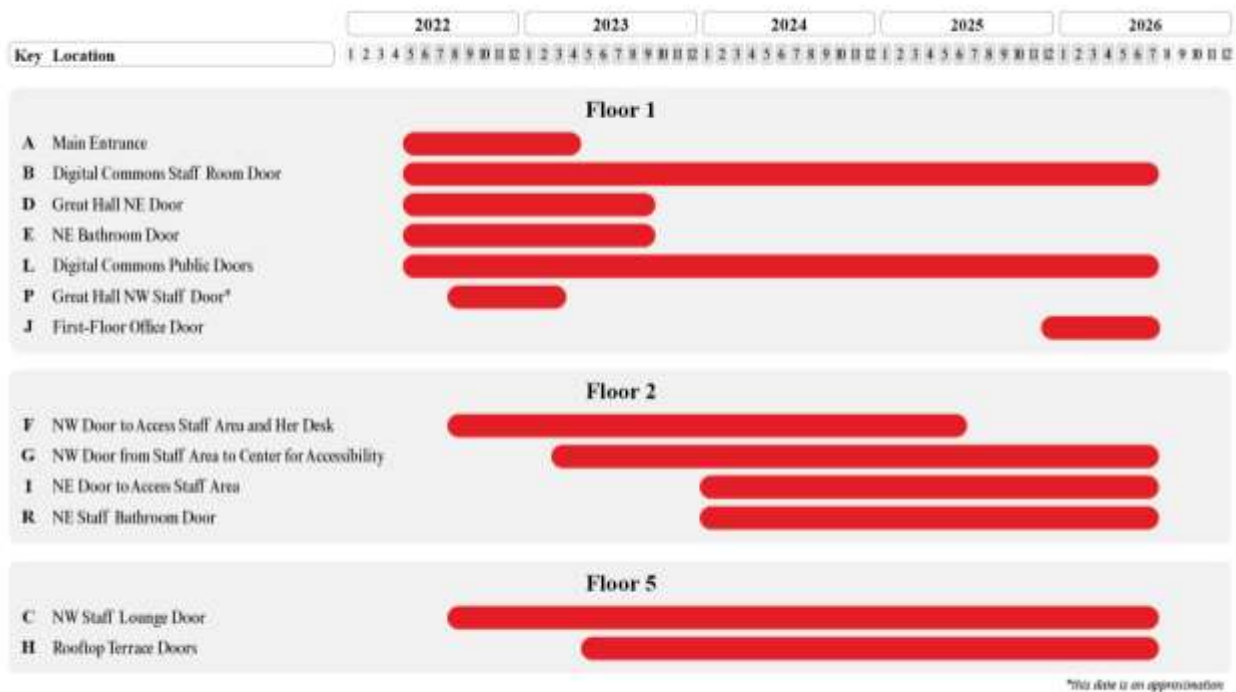


Figure 1: Graph of the duration of Ms. Weiss's Reasonable Accommodation Requests

47. DCPL's lack of engagement with, or serious consideration of, Ms. Weiss's accommodation requests make her feel dehumanized, excluded, and disregarded. Ms. Weiss must navigate through her workplace like a mouse moving through a maze, forcing her to seek the route with the fewest barriers.

48. For four years, Ms. Weiss has been subject to repeated injury, bruising, and strain in her upper body from opening inaccessible doors throughout her workplace. Her wheelchair has been damaged, with parts completely broken by the impact when it hits the door. Every day she moves throughout her workplace, she experiences anxiety and discomfort and is belittled by DCPL's inaction.

49. Ms. Weiss typically travels between the first, second, and fifth floors of the MLK Library during her workday. While she spends much of her time on the first floor assisting patrons, her desk is on the second floor, and the staff lounge and rooftop garden are on the fifth floor.

First Floor

50. On any given day, Ms. Weiss will pass through at least seven doors on the first floor multiple times.

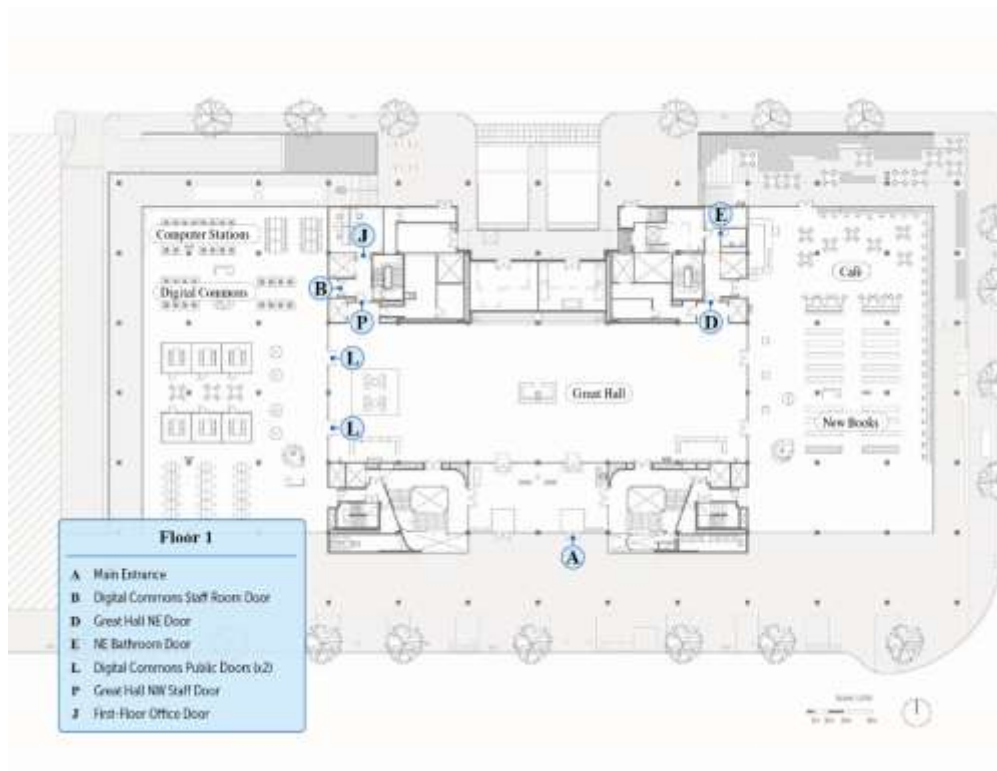


Figure 2: Map of the First Floor at MLK Library

51. To enter the library, Ms. Weiss passes through the Main Entrance (Door A)⁴ into the Great Hall. The Main Entrance is the designated entrance for all patrons and for staff with mobility disabilities to enter the Great Hall lobby, access the Digital Commons, Café, New Books section, staff areas, and bathroom, which are all located on the first floor of MLK Library.

52. To get to the Digital Commons from the Great Hall, she enters through the Digital Commons public doors (Doors L). As a Digital Navigator, Ms. Weiss spends much of her day in the Digital Commons, assisting community members in building their digital skills and troubleshooting digital issues.

53. When a patron has a question or an issue that requires the first-floor manager, Ms. Weiss and other Library Associates are expected to go to the first-floor offices, where managers sit, and seek their assistance. This requires navigating two doors (Door B or Door P and Door J) to access the NW staff area and first-floor offices, and then back through to return to the Digital Commons. When Ms. Weiss needs to access her desk on the second floor from either the Great Hall or the Digital Commons, she traverses through Doors B or P to the staff elevator.

54. When Ms. Weiss needs to use the first-floor restroom, she must exit the Digital Commons (Door L), cross the Great Hall, enter the door to the NE staff area (Door D), and then go through the door to the only bathroom on the first floor (Door E).

55. Unlike other staff members, Ms. Weiss must strategically plan every move she makes throughout the day because she experiences scrapes, strains, frustration, and demoralization when passing through any of these first-floor doors:

⁴ Upon information and belief, MLK Library does not have a naming convention for specific doors at the library. Therefore, any letter assigned to a specific door has been created and designated by the undersigned for ease of reference.

Main Entrance (Door A)

56. The Main Entrance located on G Street NW entering into the Great Hall is the only accessible staff entrance, as the staff-only entrance located in the back of the library requires stairs and is therefore inaccessible to Ms. Weiss. Ms. Weiss must go through the Main Entrance to access her workplace every day.

57. The Main Entrance door is equipped with an automatic door opener that requires a card reader to use. When Ms. Weiss started working at MLK Library, the automatic door opener was broken. When Ms. Weiss used her badge to activate the card reader, the automatic door only opened a small degree and was impossible to pull open the rest of the way due to resistance. Through conversations with coworkers, Ms. Weiss discovered that the broken feature was widely known, but it was not a priority to be fixed.

58. Without a functioning automatic door opener, Ms. Weiss could not independently enter the MLK Library, and she had to rely on a security guard to let her in.

59. On May 25, 2022, Ms. Weiss emailed DCPL's ADA Coordinator to raise her accessibility issues with the Main Entrance and requested an accessible entry into MLK Library.

60. Ms. Weiss also alerted the District's Office of Disability Rights, prompting them to survey the library again in August 2022.

61. From May 2022 to April 2023, the automatic door opener would frequently break, and Ms. Weiss could not enter her workplace independently. MLK Library would occasionally replace parts of the automatic door, but it would break again after a few weeks.

62. After DCPL rehung the door in April 2023, the Main Entrance became accessible, 11 months after Ms. Weiss raised the issue with MLK Library.

Digital Commons Public Doors (Doors L)

63. To access the Digital Commons from the Great Hall, Ms. Weiss travels multiple times per day through two sets of double-glass doors with L-shaped handles that must be pulled open. At the time she started her employment, these doors weighed between 10 to 15 pounds.

64. Between late May and early June 2022, Ms. Weiss raised her accessibility concerns with the Digital Commons Public Doors to the DCPL ADA Coordinator and requested adjustments to the door so she could have a barrier-free path to her workplace.

65. On June 9, 2022, Ms. Weiss was informed that the Digital Commons Public Door tensions had been adjusted to six pounds, the lowest tension setting available, and that the right-side doors would be propped open as a temporary solution.

66. Ms. Weiss repeatedly informed DCPL that the doorstops were ineffective, as they frequently went missing, and requested that these doors be automated. At times, Ms. Weiss purchased her own doorstops to avoid requesting them from DCPL when they went missing or wore out. Ms. Weiss was told by DCPL staff that these doors could not consistently be propped open because it would overstress the HVAC system.

67. As of the date of this filing, the Digital Commons Public Doors remain unautomated and above the five-pound ADA threshold, making it so Ms. Weiss must use extra effort and risk strain every time these doors are not propped open.

Digital Commons Staff Door (Door B)

68. To exit directly from the Digital Commons to the staff area, Ms. Weiss must pass through the Digital Commons Staff Door (Door B), which is a recessed, push bar door. At the time she started her employment, this door weighed approximately 20 pounds.

69. Between late May and early June 2022, Ms. Weiss raised the inaccessibility of the Digital Commons Staff Door to the DCPL ADA Coordinator and requested adjustments to the door so she could have a barrier-free path to her workplace.

70. On June 9, 2022, the DCPL HR Director informed Ms. Weiss that the Digital Commons Staff Door had been adjusted to 6.5 pounds, the lowest tension setting available, and that the door would be propped open as a temporary solution.

71. Ms. Weiss had not asked for this door to be propped open. The DCPL HR Director did not ask Ms. Weiss if propping this door would be an effective alteration or accommodation. Ms. Weiss informed the DCPL HR Director that the doorstop was not an effective solution because the noise level increased greatly when the Digital Commons Staff Door was open, and it made it very difficult for Ms. Weiss to work.

72. Ms. Weiss also felt embarrassed and humiliated because her coworkers discussed that the door was propped open as an accommodation for her.

73. After Ms. Weiss got her new wheelchair in April 2023, Ms. Weiss shared with DCPL that Door B was harder to reach and harder to push open in her new chair, and she was repeatedly bruised by it.

74. As of the date of this filing, the Digital Commons Staff Door remains unautomated and above the five-pound ADA threshold, and because of its weight, recessed structure, and push bar handle, Ms. Weiss must risk injury and strain when she uses this door.

Great Hall NE Staff Door (Door D) & NE Bathroom Door (Door E)

75. To access the only first-floor bathroom, Ms. Weiss passes from the Great Hall through the NE Staff Door (Door D) and then through the NE Bathroom Door (Door E) on a daily basis. Door D is a push bar door, and its pressure exceeded five pounds. Door E, which opens inward, has a lever handle and required approximately 10 to 15 pounds of pressure to

open. Ms. Weiss would injure her foot, ankle, arm, and side maneuvering through these doors to reach the only bathroom on the floor.

76. Between late May and early June 2022, Ms. Weiss raised her accessibility issues with Doors D and E to the DCPL ADA Coordinator and requested a barrier-free path.

77. In response, the Great Hall NE Staff Door (Door D) was adjusted to between five to six pounds and the door was propped open as a temporary solution. The NE Bathroom Door (Door E) weight was adjusted to between five and six pounds and would not be propped open.

78. In August 2022, Ms. Weiss informed DCPL that the doorstops were ineffective, as they frequently went missing, and discussed her difficulty with these doors during a walkthrough with ODR's architect, DCPL's Capital Projects Liaison, DCPL's HR Director, DCPL's Facilities Director, and DCPL's ADA Coordinator.

79. After Ms. Weiss got her new wheelchair, she shared her increased difficulties opening Doors D and E with her supervisor, the MLK Library Director, and DCPL's HR Director. Specifically, the Great Hall NE Staff Door (Door D) is a push bar door, and the bar would stick if the footplates on Ms. Weiss's wheelchair pressed into the door. This happened frequently because Ms. Weiss had to maneuver close enough to the door to push it open. She would then use her foot to prop the door open while she rolled through. Her arm was frequently scratched and bumped as she rolled through. The door into the bathroom (Door E) remained too heavy for Ms. Weiss, and she was often hit by the lever handle and teeth of this door.

80. During a walk-through of her workplace routes with DCPL's HR Director and the DCPL ADA Coordinator, Ms. Weiss specifically discussed her difficulty accessing the NE bathroom and reiterated her request for the doors to be accessible.

81. Ms. Weiss repeatedly reiterated the daily strain she experiences in her shoulders, wrists, and hands caused from manually opening the heavy doors and requested updates on the status of her accommodation request.

82. These doors were finally automated in September 2023, 16 months after Ms. Weiss's initial accommodation request.

Great Hall NW Staff Door (Door P)

83. To access the NW Staff Area and first-floor offices directly from the Great Hall, Ms. Weiss must pass through a staff door (Door P).

84. Door P is a push bar door and was wired for an automatic opener, but the function was not turned on prior to March 2023. Without the automatic door opener feature activated, Door P's pressure vastly exceeded five pounds, and it was difficult for Ms. Weiss to pass through. Ms. Weiss uses this door daily.

85. On May 26, 2022, Ms. Weiss emailed the DCPL ADA Coordinator and her supervisor referring to a facilities ticket entered by the Digital Commons Manager for this door. Ms. Weiss commented that this door may already have some auto-opening capability because of the hardware installed around the door. She asked if someone could look into Door P's setup before the weekend. Facilities did not investigate the issue and turn on the auto-opening feature for months.

86. Ms. Weiss alerted DCPL's HR Director that this door was too heavy for her to operate. In its August 2022 accessibility report, after a walkthrough with Ms. Weiss, the DCPL HR Director, and DCPL's ADA Coordinator, ODR similarly found that the door from the entrance lobby in the Great Hall to the staff room was too heavy to operate.

87. The ODR assessment noted that on request from Ms. Weiss, the library agreed to provide an automatic door opener for the Great Hall NW Staff Door.

88. As Ms. Weiss suspected, this door did have auto-opening features already installed and the function was activated in approximately March 2023, 10 months after Ms. Weiss raised the issue with MLK Library.

First-Floor Office Door (Door J)

89. About three to four times a week, Ms. Weiss can expect to go to the first-floor offices to get office supplies or speak with the first-floor managers.

90. The First-Floor Office Door is a card-swipe door, has a lever handle, and it weighed between two to three times the ADA standard five-pound maximum weight through December 2025. The door was so heavy that Ms. Weiss had difficulty steering around the door once she pulled it open because it opens into her path. The repetitive stress of pulling on this door caused strain to Ms. Weiss's shoulder and arm.

91. On December 8, 2025, Ms. Weiss submitted a ticket to Facilities requesting a reduction in the tension of the First-Floor Office Door. Over a week later, the tension was partially reduced to about 10 to 12 pounds, and Facilities marked the ticket resolved. However, it was not resolved to ADA compliance and continues to cause Ms. Weiss strain and discomfort.

92. As of the date of this filing, the First-Floor Office Door remains unautomated and the tension remains greater than five pounds, making it so Ms. Weiss must risk injury to speak with a first-floor manager or to retrieve office supplies.

Second Floor

93. The second floor of MLK Library provides spaces for staff and library patrons, including the Center for Accessibility, Children's Space, Teen Space, Adult Learning, and community meeting spaces. For Ms. Weiss, the second floor is also where she can access additional bathrooms, the Center for Accessibility, and the staff area where her desk is.

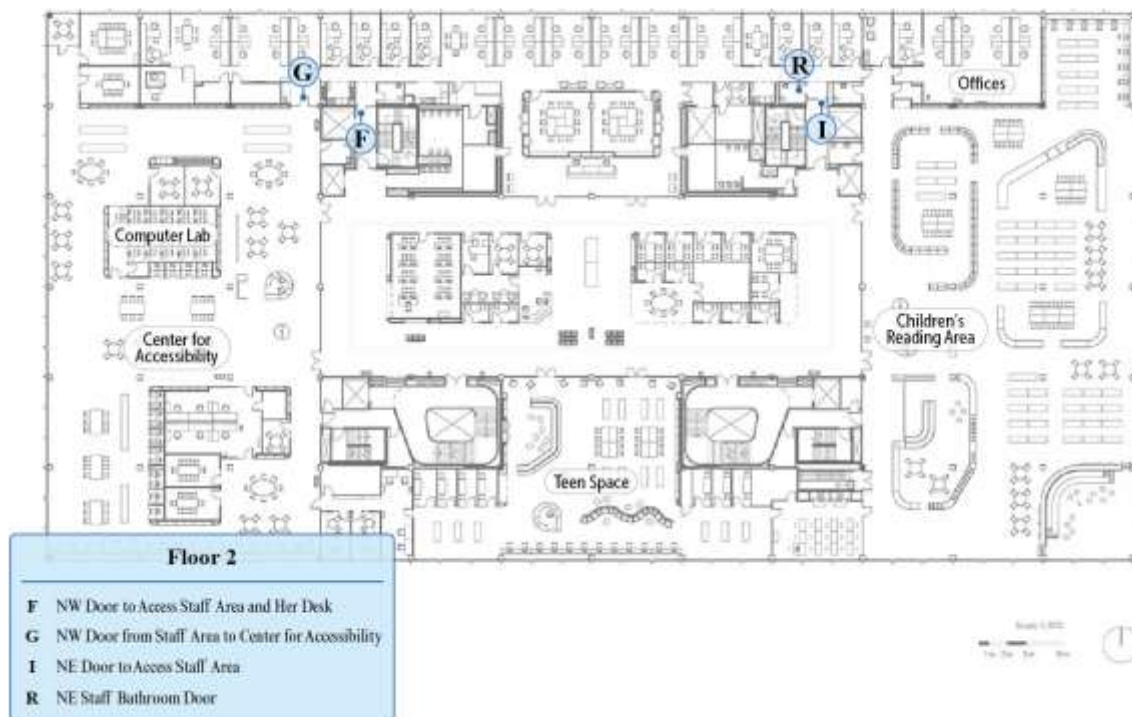


Figure 3: Map of the Second Floor at MLK Library

94. Ms. Weiss works at her desk for a minimum of two hours per day. She also stores her belongings there and retrieves supplies from her desk throughout the day. To get to her desk, she takes the elevator to the second floor, exits the elevator, and passes through a door to the staff area (Door F). To access the Center for Accessibility from the staff area, Ms. Weiss travels through a door that remains inaccessible (Door G). If the first-floor bathroom is occupied, the closest accessible bathroom is on the second floor, where she must travel through two doors (Doors I and R).

95. Unlike other staff members, Ms. Weiss must strategically plan every move she makes throughout the day because she experiences scrapes, strains, frustration, and demoralization when passing through any of these second-floor doors:

NW Door to Access Staff Area and Her Desk (Door F)

96. Although Ms. Weiss spends much of her workday on the first floor in the Digital Commons, Ms. Weiss must take an elevator to the second floor and open Door F to access her desk to work during the day, retrieve supplies, and store her belongings and her computer. Ms. Weiss uses this door every day. Door F is a double door with a lever handle on the left door. It is a staff-only card-swipe door, and the card-swipe is on the right wall.

97. When Ms. Weiss started at DCPL, the pressure of Door F was approximately fifteen pounds. Because of its weight, the location of the card-swipe feature on the right wall, and the lever handle on the left door, it was extremely difficult for Ms. Weiss to open and navigate through because of her disability. When she was able to open the door, Ms. Weiss often would be hit by the door as she went through it.

98. When Ms. Weiss accidentally dropped something going through the door, she could get stuck and unable to move through the door without help. At times, she had to hold the door open with her head and slowly try to roll through.

99. On July 7, 2022, Ms. Weiss emailed the DCPL HR Director and her supervisor requesting an automatic door opener for Door F.

100. Without hearing a response or acknowledgement of her request, Ms. Weiss followed up on August 16, 2022, reiterating her need for an automatic door opener.

101. In response, on August 19, 2022, the DCPL ADA Coordinator acknowledged receipt of Ms. Weiss's request and, for the first time since Ms. Weiss began requesting accommodations, DCPL told her that she needed to provide medical documentation to submit a

reasonable accommodation request. Because Ms. Weiss has an obvious disability, she understood it was not necessary for her to complete the form, and she did not do so.

102. Ms. Weiss discussed and demonstrated her difficulty opening Door F to the ODR Architect, DCPL's Capital Projects Liaison, DCPL's HR Director, and DCPL's Head of Facilities during a walkthrough on August 24, 2022. Ms. Weiss further described how she could become stuck in the doorway if an item fell in front of her while she tried to maneuver quickly through the door in an attempt to avoid being hit. In response, the DCPL HR Director suggested that Ms. Weiss should simply not carry any of her items with her when navigating her workspace to prevent items from falling and causing her to get stuck in the doorway.

103. For approximately nine months, from August 2022 to May 2023, Ms. Weiss did not hear any update about her request.

104. After receiving a new wheelchair in April 2023, Ms. Weiss followed up on her request with the MLK Library Director, DCPL ADA Coordinator, and DCPL HR Director to explain how her new chair increases the likelihood of injury to herself and her wheelchair because the new seat depth created more distance away from the door handle.

105. On June 6, 2023, during a walkthrough with the DCPL HR Director and DCPL ADA Coordinator, Ms. Weiss again discussed her difficulty opening Door F. During this meeting, the DCPL HR Director suggested that Ms. Weiss use a grabber tool to open the door. Ms. Weiss explained and demonstrated how that would not be workable and reiterated her need for an automatic door opener. During this meeting, the DCPL HR Director told Ms. Weiss that they needed to find alternative options because it would be difficult to find funds soon for automatic door openers.

106. Again, on June 22, 2023, Ms. Weiss had another walkthrough with the DCPL HR Director, MLK Library Director, and DCPL's Capital Projects Liaison where she discussed her difficulties with Door F.

107. Ms. Weiss repeatedly requested updates on her request. She was assured by the DCPL HR Director that Door F was a priority for installation of an automatic door opener and one would be installed by September 28, 2023. When it was not installed, the DCPL HR Director informed her that it was never on the procurement list, and she had to wait until approximately February 2024. Ms. Weiss was later told that the door was on hold indefinitely.

108. Due to the lack of an automated door opener, Ms. Weiss sustained injuries and hip discomfort from opening Door F. For example, in September 2024, Ms. Weiss experienced significant, shooting pain in her left hip while trying to push open the second-floor staff door and had to take leave from work.

109. The lack of automation also caused damage to her wheelchair. For example, in early May 2024, the adapter that held her iPad and iPhone attached to her wheelchair was permanently damaged.

110. Door F was not automated until June 24, 2025—35 months after Ms. Weiss initially requested an automatic door opener.

NW Door from the Staff Area into the Center for Accessibility (Door G)

111. The Center for Accessibility is purportedly designed to provide patrons with disabilities equal access to library resources and services. The Center for Accessibility also houses a Computer Lab where mandatory staff trainings are held.

112. Door G has a lever handle that opens in from the staff area. Prior to its tension being reduced in approximately April 2025, the pressure of Door G was approximately twenty pounds.

113. Ironically, Ms. Weiss cannot safely access the Center for Accessibility from the staff area. To use Door G to enter the Center, Ms. Weiss must swipe her staff badge at the card-swipe feature, twist and hold down the lever handle, pull approximately twenty pounds of weight towards herself and her wheelchair, then carefully wheel her chair through the door while the door weight pushes back against her. Although this door would provide a more direct route to her desk, Ms. Weiss avoids it because it is difficult to open. She would use the door more frequently if it were accessible.

114. Door G has repeatedly been flagged by Ms. Weiss and other staff members at MLK Library for its inaccessibility caused by the weight of the door, but DCPL did not follow up or reduce the tension of Door G for nearly two years after Ms. Weiss's initial request.

115. Ms. Weiss generally used the public doors to access the Center for Accessibility to avoid using Door G. Other DCPL interns and volunteers who use wheelchairs have also shared with Ms. Weiss that they avoid Door G because it is difficult to open.

116. In June 2023, Ms. Weiss raised her concerns about the significant weight of the door to the DCPL HR Director.

117. In 2024, R. McGhee & Associates Architects completed an ADA Site Survey of the MLK Library. The report highlighted numerous accessibility problems in MLK Library, including that Door G required 15 pounds of force to open.

118. In Spring 2024 and 2025, in preparation for two incoming summer interns who used power wheelchairs and had limited upper-body strength, Ms. Weiss again requested that the door tension be reduced. The staff member supervising the interns also requested that the door's weight be lowered. No changes were made in response to these requests.

119. Ms. Weiss repeatedly submitted maintenance tickets, reiterating the need for the pressure of the door to be reduced or for the closing mechanism to be replaced, but the tickets would be closed without resolution. She also corresponded with DCPL's ADA Coordinator, the MLK Library Director, DCPL's HR Director, and the Deputy Director of Facilities about the heaviness of this door asking for it to be brought into compliance with the ADA and was told it was part of a future planned project.

120. Without resolution, Ms. Weiss was subject to injury and indignity when she went through the door. For example, in March 2025, Ms. Weiss had to pass through Door G from her desk to attend a mandatory staff training in the Center for Accessibility before the public doors to the Center had been fully propped open. Because of the significant weight, the door hit Ms. Weiss and her wheelchair as she rolled through.

121. In April 2025, the door's weight was reduced to its lowest setting, but it still weighed approximately ten pounds. She was again informed that it was added to a projects list as part of an indeterminate future planned project.

122. As of the date of this filing, the tension in the door has not been reduced further and remains approximately 10 pounds, making it so Ms. Weiss cannot travel between the Center and the staff areas without risking injury to herself and her wheelchair.

NE Door to Access Staff Area (Door I)

123. To enter the accessible bathroom on the second floor, Ms. Weiss must first open Door I to enter the staff area. Door I has a lever handle and requires a card-swipe to enter. Ms. Weiss uses this door approximately 3-4 times per week.

124. Because this door's pressure was approximately 15 pounds, it required Ms. Weiss to use significant effort to hold the door open for her to roll through.

125. On or around May 4, 2023, after receiving her new wheelchair, Ms. Weiss had a conversation with the MLK Library Director explaining how the new seat depth created more distance between her and the door handle. Ms. Weiss specifically highlighted in a follow-up email that Door I's pressure had never been adjusted to an ADA compliant level.

126. On June 6, 2023, during a walkthrough with the DCPL HR Director and DCPL ADA Coordinator, Ms. Weiss demonstrated how the pressure made it difficult to open the door. It was during this walkthrough that the DCPL HR Director suggested she could use a grabber tool to open the door. Ms. Weiss explained and demonstrated how that would not be workable and reiterated her need for the door tension to be reduced.

127. Seven months later, on January 26, 2024, Ms. Weiss submitted a maintenance request for the tension to be reduced for Door I (and Door R) to less than or equal to five pounds.

128. On February 8, 2024, the weight tension was reduced to approximately six pounds.

129. As of the date of this filing, the door's force remains greater than the five pounds required by the 2010 ADA Standards for Accessible Design, making it so Ms. Weiss must risk strain when she uses this door.

NE Staff Bathroom Door (Door R)

130. When Ms. Weiss needs to use the bathroom, she typically uses the first-floor bathroom. However, when that bathroom is occupied, the nearest accessible alternative is on the second floor where she must take the elevator, open the door to access the staff area (Door I), then open the door to the bathroom (Door R). Door R has a lever handle with a narrow entry. Ms. Weiss uses this door approximately 3-4 times per week.

131. In 2024, R. McGhee & Associates Architects completed an ADA Site Survey of the MLK Library. The report highlighted numerous accessibility problems in MLK Library and found that Door R required 14 pounds of force to open.

132. Because this door's pressure exceeded five pounds, it required Ms. Weiss to use at least twice as much effort to hold the door open for her to roll through. Ms. Weiss submitted a maintenance work request on January 26, 2024, requesting that the tension be reduced for Doors I and R to less than or equal to five pounds. In February 2024, the tension was reduced but remained greater than five pounds.

133. As of the date of this filing, the door remains greater than five pounds required by the 2010 ADA Standards for Accessible Design, making it so Ms. Weiss must risk strain when she uses this door.

Fifth Floor

134. The fifth floor of MLK Library includes a staff lounge, meeting and event spaces, and access to the rooftop terrace for library staff and patrons. At least five doors on the fifth floor are not accessible to Ms. Weiss.



Figure 4: Map of the Fifth Floor at MLK Library

135. If Ms. Weiss wants to attend an event or visit the rooftop terrace, she must go through two sets of doors on either the Northwest or Northeast side (Doors H). Similarly, if there is a staff event in the lounge on the fifth floor, Ms. Weiss must enter through one door (Door C).

136. Because these doors are not accessible, Ms. Weiss tries to avoid them. Instead, Ms. Weiss eats lunch at her desk because she cannot access the staff lounge or the rooftop garden.

137. These doors all exceed five pounds, making them inaccessible to Ms. Weiss and putting her at risk for bumps, scrapes, muscle strains, frustration, and demoralization when passing through any of these fifth-floor doors:

Rooftop Terrace Doors (Doors H)

138. The rooftop terrace doors open to the roof of MLK Library and provide views of Downtown DC and access to a garden for library patrons and staff to enjoy. MLK Library often

hosts events on the rooftop terrace, such as a local concert series. Doors H have L-shaped handles that can be pulled open.

139. When Ms. Weiss attempts to go to the rooftop garden, the door's weight makes it difficult to open and maneuver, causing risk of injury and damage to her wheelchair as the door scrapes the left side of her chair. The weight of the doors ranged from approximately seven to twenty pounds of pressure to open.

140. DCPL has been aware that the doors to access the roof are not accessible since at least February 2023 when DCPL received plans from a third-party architecture firm on how to install automatic door openers to access the roof.

141. In May and June 2023, Ms. Weiss told her supervisor, the DCPL HR Director, DCPL ADA Coordinator, MLK Library Director, and the DCPL Capital Projects Liaison that the doors were not accessible and requested automatic door openers. The DCPL HR Director responded that automatic door openers would be installed but did not provide a timeline as to when the project would be completed.

142. Ms. Weiss submitted multiple maintenance requests to reduce the weight of the doors. In May 2025, the doors were adjusted to the lowest permitted pressure, leaving the interior doors at 7–8 pounds of pressure and the exterior doors at 14 pounds of pressure.

143. On May 30, 2025, Ms. Weiss raised the inaccessibility of the doors to the roof to the DCPL HR Director and again to the DCPL HR Specialist and DCPL ADA Coordinator in March 2026.

144. As of the date of this filing, the doors' tension have not been further reduced, and no automatic door opener has been installed. As a result, Ms. Weiss must risk injury to access and enjoy the rooftop garden on equal terms to her coworkers without disabilities.

NW Staff Lounge (Door C)

145. The fifth-floor staff lounge is designated as an employee-only area where staff can take breaks, eat meals, socialize with coworkers, fill their water bottles, and rest between work responsibilities. The door to the staff lounge (Door C) is within an alcove set back from the hallway and the card reader. Door C requires a card-swipe function to enter, has a lever handle that opens into Ms. Weiss's path, and requires her to push down the lever and hold while trying to make her way through the door.

146. In August 2022, during the walkthrough with ODR and DCPL staff, Ms. Weiss pointed out that this door was not accessible. Specifically, Ms. Weiss highlighted that the weight of the door was greater than five pounds and it was difficult to reach given its recessed nature in combination with a card-swipe function and lever handle.

147. In May and June 2023, Ms. Weiss reiterated to her supervisor, the DCPL HR Director, DCPL ADA Coordinator, MLK Library Director, and the DCPL Capital Projects Liaison that the door was not accessible and requested an automatic door opener.

148. In July 2023, the HR Director responded that an automatic door opener would be installed, but she did not provide a timeline when the project would be completed.

149. Although the tension in the door was decreased to approximately 10-12 pounds of pressure, it remains double the standard under the ADA.

150. As of the date of filing this Complaint, the door remains inaccessible, making it so that Ms. Weiss would need to risk injury to eat lunch in the staff lounge, attend a joint staff celebration, or to use the only water bottle filler in the building – as her coworkers can do without a thought.

DCPL's Failure to Engage in the Interactive Process in Good Faith

Despite Repeated Requests, Demonstrations, and Follow-Up, Much of MLK Library Remains Inaccessible

Accommodation Requests

151. When Ms. Weiss first joined DCPL in spring 2022, she informed DCPL's management and ADA Coordinator about her disability and her need for accommodation to access her workplace. Over the last four years, Ms. Weiss has participated in countless meetings, email exchanges, conversations, and demonstrations regarding her need for manual doors with reduced pressure and/or automatic door openers.

152. By contrast, DCPL has not engaged in the interactive process in good faith. It has on multiple occasions waited weeks and even months before responding to Ms. Weiss; created administrative barriers, including asking for unnecessary medical documentation and forms; failed to provide timely updates; and, ultimately, not implemented Ms. Weiss's requested accommodations or offered effective alternatives or interim accommodations that would allow Ms. Weiss to perform the functions of her position and enjoy the equal benefits and privileges of employment.

153. In May, June, July, and August of 2022, Ms. Weiss wrote to the DCPL ADA Coordinator and DCPL's HR Director, as well as other DCPL leadership, numerous times, explaining that she had difficulty navigating her workplace because physically opening several closed, heavy doors that ranged from approximately 10 to 20 pounds of pressure caused her physical strain and injury. Ms. Weiss requested automatic door openers so she could have a barrier-free path in her workplace.

154. Ms. Weiss also reported to the DCPL ADA Coordinator and DCPL HR Director when she was injured by the inaccessible doors and continued to request automatic door openers at the various doors she encountered throughout the day.

155. While the DCPL HR Director acknowledged Ms. Weiss's request for automatic door openers and promised to keep her informed of the status and installation plan, years went by with little progress and few resolutions.

156. From approximately September 2022 to April 2023, there was virtually no communication from the DCPL HR Director or DCPL ADA Coordinator regarding her reasonable accommodation request.

157. In May 2023, a year after her initial requests, there was still no progress. At this point, Ms. Weiss had begun using a new wheelchair, which presented even more difficulty when encountering heavy and hard-to-reach manual doors. It was especially difficult when the door was located in an alcove set back from the hallway, such as Door C.

158. Ms. Weiss notified her supervisor, the DCPL ADA Coordinator, the DCPL HR Director, MLK Director, and numerous other DCPL staff that she was repeatedly bruised when attempting to navigate the Digital Commons Staff Door (Door B) and again repeated her request for automatic door openers. Ms. Weiss provided a list of doors on the first, second, and fifth floors, including Doors B, C, D, E, F, G, H, and I, that were noncompliant with the ADA 2010 Standards and caused her difficulty. She shared this list with her supervisor on May 15, 2023, and the DCPL HR Director on June 2, 2023.

159. In June 2023, the DCPL HR Director told Ms. Weiss that she needed to seek alternative solutions because funds for automatic door openers would not be available anytime soon. The Director did not provide a cost estimate or an estimated timeline of when the funds

would become available. Ms. Weiss offered to purchase an auto-opening kit herself on Amazon for \$600-\$800 if DCPL was able to install it, but she did not receive a response to her offer. This cost was miniscule compared to DCPL's operating budget of over \$77 million in Fiscal Year 2023.⁵

160. Ms. Weiss also reached out to ODR for assistance. ODR separately tried to advocate for Ms. Weiss to get clear information and a timeline on the status of Ms. Weiss's request to no avail.

161. Despite the little progress, consistent delays, and months of silence, Ms. Weiss continued to advocate for accessible doors and requested accommodations to manual doors from spring 2024 through spring 2026. Ms. Weiss also began submitting maintenance and facilities requests asking for the manual doors to be automated because DCPL continued to delay and deny her reasonable accommodations requests.

Door Demonstrations

162. In addition to email correspondence raising her accommodations requests, Ms. Weiss physically demonstrated the inaccessibility of her workplace to the DCPL HR Director, ADA Coordinators, and other staff at DCPL.

163. In June 2022, Ms. Weiss discussed the difficulty she had opening heavy and hard-to-reach doors without an automatic door opener to the DCPL HR Director and DCPL ADA Coordinator in person at MLK Library. Ms. Weiss discussed and showed the doors along her main routes in the MLK library that were too heavy or too hard to reach and navigate through, including the front entrance (Door A), first-floor bathroom (Door E), staff door to get to the first-

⁵ The District's fiscal year 2023 ran from October 2022 to September 30, 2023.

floor bathroom (Door D), Digital Commons staff door (Door B), and the Digital Commons main doors from the Great Hall (Doors L).

164. In August 2022, at Ms. Weiss's request, ODR came back for the third time in four months to complete an accessibility walkthrough. The ODR Architect, DCPL's Capital Projects Liaison, DCPL's HR Director, DCPL's Head of Facilities, and DCPL's ADA Coordinator conducted a walk-through of the MLK Library with Ms. Weiss. Ms. Weiss demonstrated and/or discussed her difficulties opening, at a minimum, Doors A, C, D, E, F, and P.

165. In May 2023, while explaining why she needed automatic doors installed, Ms. Weiss demonstrated to the MLK Library Director how she must practically bend in half to manually open a door because the new seat depth in her wheelchair created further distance between herself and the door handle.

166. In June 2023, the DCPL HR Director, DCPL ADA Coordinator, MLK Library Director, and DCPL Capital Projects Liaison conducted additional walk-throughs of the MLK Library and again Ms. Weiss demonstrated her difficulty opening manual, heavy, hard-to-navigate doors.

167. Despite these four walkthroughs, the problems remained. Throughout the over four-year-long period during which Ms. Weiss was seeking accommodations, DCPL did not fully implement her requested accommodations or suggest alternative and effective accommodations in good faith.

168. For example, in June 2022, DCPL implemented temporary measures, such as propping open certain doors and reducing the weight of others (although still not to five pounds, as required by the 2010 ADA Standards for Accessible Design). Although Ms. Weiss agreed to those measures as a stopgap for eventual plans to install automatic door openers, they were not

workable. The tension of many doors was still too high, meaning Ms. Weiss could not open a door without risking strain and injury. Often, doorstops would go missing, making the doors inaccessible to Ms. Weiss. For several of the door stops, Ms. Weiss was told by other library staff that they could not prop those doors open because of HVAC issues, and so the doors remained closed. Other times, the doors could not be propped open because the noise levels were too loud.

169. During the walkthrough in August 2022, the DCPL HR Director suggested that Ms. Weiss should simply not carry any of her items with her when navigating her workspace to prevent items from falling and causing her to get stuck in the doorway. During the walkthrough in June 2023, Ms. Weiss was told by DCPL's HR Director that she could use a grabber tool to open the door. Ms. Weiss explained, and when pressed demonstrated, how that would not be workable and reiterated her need for an automatic door opener. Neither of these suggestions were feasible solutions that would allow Ms. Weiss to navigate the inaccessible doors.

170. Ms. Weiss continued to request accommodations in the form of automatic door openers and other modifications to the manual doors. Then, in early October 2023, Ms. Weiss learned from her manager that her request for automatic door openers was not treated as an accommodation request because Ms. Weiss did not have her physician complete the medical questionnaire. This response was shocking and frustrating for Ms. Weiss to hear that her concerns were not respected or acknowledged as an accommodation request.

171. To the extent that any doors were automated or otherwise adjusted between 2022 and 2026, it was after such long delays that Ms. Weiss was effectively denied her requested reasonable accommodation.

DCPL's Baseless Insistence on Medical Documentation

172. At the start of her employment, Ms. Weiss provided documentation from her medical provider and completed the District of Columbia Employment Applicant Identification Sheet, which both stated she had a disability.

173. Although Ms. Weiss informed DCPL of her disability and made numerous accommodations requests between May 2022 and August 2022, at no point did anyone ask her for medical documentation. Then, on August 19, 2022, Ms. Weiss received an email from the new DCPL ADA Coordinator requesting that Ms. Weiss have her physician complete a medical questionnaire.

174. The questionnaire required Ms. Weiss's physician to provide detailed information about her cerebral palsy, including her diagnosis and medical history, prognosis, expected duration of the disability, and the ways in which her disability affects her compared with an individual without cerebral palsy.

175. When Ms. Weiss reached out to an Attorney Advisor at the Office of Disability Rights for assistance, the attorney confirmed that employers cannot require paperwork establishing the presence of a disability or related-need accommodation when an employee's disability and need for accommodation is obvious. Ms. Weiss's disability and use of a wheelchair, coupled with the information she had already provided to DCPL, made her disability and need for accommodation obvious.

176. Ms. Weiss informed the DCPL ADA Coordinator that it was inappropriate to request medical information or documentation from her doctor for her visible and obvious disability and need for an accommodation. She further stated that she self-identified as a person with a disability in onboarding paperwork, had informed the DC Human Resources Department

of her disability, and had provided the DC Human Resources Department with two notes from medical providers regarding her disability.

177. The DCPL ADA Coordinator responded that the medical questionnaire was the ADA application for requesting an accommodation. Ms. Weiss directed her to ODR's Attorney Advisor because of the obvious nature of her disability and her accommodation request. Accordingly, Ms. Weiss did not complete the form. The DCPL ADA Coordinator informed Ms. Weiss that she would contact the District's Human Resources office to locate documentation about Ms. Weiss's disability and would be in touch. Ms. Weiss did not hear anything further regarding the need for her to fill out the medical questionnaire.

178. In June 2023, during a walkthrough with the DCPL HR Director and DCPL ADA Coordinator, the DCPL HR Director said there would not be funds anytime soon for automatic door openers. She instructed Ms. Weiss to contact a healthcare provider to inquire about equipment that would help her open doors. When Ms. Weiss replied that such equipment did not exist, the Director asked her to get a letter from a healthcare provider stating that.

179. In October 2023, Ms. Weiss's supervisor informed her that DCPL's HR Director had not treated her request as a reasonable accommodation request because no medical documentation had been provided.

180. DCPL's demand for medical documentation created another unnecessary barrier, leaving Ms. Weiss feeling frustrated, disrespected, and discriminated against.

Daily Impact on Ms. Weiss

181. The past four years have caused physical and emotional pain to Ms. Weiss. From the very beginning of her employment, it was clear that her workplace was not built for people with disabilities. Ms. Weiss felt uncomfortable and frustrated when she had to bring the blatant oversights and ADA violations to the attention of her superiors. The absence of an established

process for requesting reasonable accommodations and DCPL's continuous delays reasonably conveyed to Ms. Weiss that securing the necessary accommodations would be a prolonged and difficult process. The months of silence and years of inaction made Ms. Weiss feel discriminated against, dismissed, and dehumanized.

182. Every time Ms. Weiss navigated through an area with a heavy or hard-to-reach door, she risked personal injury. Every time Ms. Weiss had to go to a new part of the library as part of her job, she braced herself to get hit or scraped by doors.

183. Repeatedly opening multiple doors greater than the ADA five-pound threshold places significant strain on Ms. Weiss's muscles. When her muscles are fatigued, it impairs her gross motor coordination, making it even harder for her to navigate through doors.

184. Ms. Weiss was frequently injured and bruised on her arm when she had to manually open doors. The repeated strain on Ms. Weiss's upper body caused her pain, and she experienced flare-ups of her tennis elbow, golfer's elbow, and a stress injury under her right ribs. The constant strain on Ms. Weiss's muscles from opening and navigating through heavy and hard-to-reach doors causes a worsened level of rigidity and loss of mobility. This makes it harder for Ms. Weiss to get dressed and perform activities of daily living and will have a long-term impact on her health. The pain and injuries Ms. Weiss sustained from repeatedly opening inaccessible doors at DCPL required her to take leave from work multiple times over the years.

185. Every time Ms. Weiss navigated through an area with a heavy or hard-to-reach door, she also risked, and in fact experienced, damage to her wheelchair over the past four years. For example, in October 2024, the right armrest of Ms. Weiss's wheelchair, which was repeatedly struck by the door as she passed through it, slid completely off its frame. If her

wheelchair became undriveable, Ms. Weiss would not merely miss work while awaiting repairs—she would be unable to leave her apartment.

186. These daily risks and pain caused immense emotional turmoil and stress, to the point where, at least once per week, Ms. Weiss began breaking down in tears during the workday. When it began to feel unmanageable, Ms. Weiss consulted her doctor, who increased the dosage of her antidepressant medication for the first time in ten years. She had trouble sleeping; felt consumed by thoughts about the inequity she was experiencing; had a pit in her stomach every time she went to work; and experienced embarrassment, indignity, and anger on a daily basis at work.

187. Ms. Weiss also had to hide her feelings at work, because based on her experience she understood that she would receive backlash should she show how angry, overwhelmed, and miserable she was. For example, in July 2022, Ms. Weiss's wheelchair broke at work after she clipped a table in the Digital Commons. Ms. Weiss went to the DCPL HR Director in tears. The HR Director told Ms. Weiss that she could go back to her work station in the Digital Commons or she would be escorted out of the building. Ms. Weiss also received negative comments on her first performance review because of her interactions with the Human Resources Department.

188. Unlike her nondisabled coworkers, who have multiple effortless ways to move throughout the library, Ms. Weiss continues to navigate her workplace like a maze in search of the most accessible route.

189. Without a reduction in tension to bring the doors into compliance with the ADA or installation of automatic doors at each of the doors that Ms. Weiss uses throughout her workday, Ms. Weiss risks injuring her body or wheelchair when accessing her workspace and continues to experience the indignity of discrimination and its attendant emotional distress.

Exhaustion of Administrative Remedies

190. Ms. Weiss has exhausted her administrative remedies.

191. On October 20, 2023, Ms. Weiss contacted a District Equal Employment Opportunity counselor and initiated informal counseling. After informal resolution failed, Ms. Weiss received an exit letter and notice of her right to file a formal complaint on December 11, 2023.

192. On December 22, 2023, Ms. Weiss filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) alleging disability discrimination and retaliation. On January 2, 2024, she filed an Appendix to her Charge of Discrimination, which provided additional information and detail about DCPL’s discriminatory actions.

193. After investigation, the EEOC issued an initial Letter of Determination on February 27, 2026,⁶ which found reasonable cause that, since May 2022, DCPL had discriminated against Ms. Weiss due to her disability in violation of the ADA by failing to accommodate her requests to have doors in her workplace made accessible to her. The EEOC found that Ms. Weiss had requested DCPL to make various doors accessible, including “the staff door to the area where her workspace is and doors to the staff lounge, the Great Hall, the roof garden, areas leading to restrooms or elevators, and the first-floor office.” Although some doors were automated in response to these requests, the doors lacking automated capabilities or that remained inaccessible prevented Ms. Weiss “from being able to enjoy the full terms, conditions, and privileges of employment.”

194. After DCPL declined to engage in conciliation, Ms. Weiss received a Notice of Right to Sue on April 30, 2026.

⁶ An Amended Letter of Determination was issued on April 24, 2026 to correct a factual error, but the substantive decision remained the same.

CLAIMS FOR RELIEF

Count One

Violations of Title I of the ADA – Reasonable Accommodations

42 U.S.C. §§ 12111 *et seq.*

195. Plaintiff incorporates by reference the allegations in paragraphs 1 through 194 as though fully set forth herein.

196. Title I of the ADA, 42 U.S.C. §§ 12111-117, and its implementing regulation, 29 C.F.R. Part 1630, require covered employers, to refrain from discriminating against employees with disabilities, including by failing to provide reasonable accommodations to such employees.

197. Ms. Weiss is an individual with a disability. She is diagnosed with spastic cerebral palsy and requires a wheelchair for mobility. Her disability constitutes a physical impairment which substantially limits her ability to walk, limiting a major life activity. 42 U.S.C. § 12102.

198. DCPL is a covered employer. 42 U.S.C. § 12111(5).

199. Ms. Weiss applied for, was interviewed for, and has been working for DCPL as a Digital Navigator for four years, providing professional services such as helping patrons locate digital information and assisting them with access to computers or electronic resources. She therefore satisfies the requisite skill, experience, and other requirements necessary to perform the essential functions and is qualified for the job of Digital Navigator at DCPL. 29 C.F.R. § 1630.2(m).

200. DCPL had notice of Ms. Weiss's disability and need for reasonable accommodation at the time of onboarding. Ms. Weiss's disability was obvious, notwithstanding the medical documentation she provided on the District of Columbia Employment Applicant Identification Sheet and communications provided to multiple staff at DCPL about her disability.

201. Ms. Weiss communicated that she had a disability and the need for reasonable accommodations through verbal and written communications with DCPL. She began requesting

reasonable accommodations for certain doors in the MLK Library in May 2022. She has followed up on this request and demonstrated her need for reasonable accommodations to the DCPL HR Director and DCPL ADA Coordinator multiple times since 2022.

202. Reasonable accommodations include “making existing facilities used by employees readily accessible to and usable by individuals with disabilities.” 42 U.S.C. § 12111(9)(A). They further extend to “[m]odifications or adjustments that enable . . . [an] employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by [the employer’s] other similarly situated employees without disabilities.” 29 C.F.R. § 1630.2(o)(1)(iii).

203. Ms. Weiss’s request is reasonable and does not impose an undue burden on DCPL. For example, upgrades to certain doors demonstrate that DCPL possesses the necessary funding, authority, and operational capacity to conduct building modifications and implement Ms. Weiss’s requested accommodation. 42 U.S.C. § 12112(b)(5)(A).

204. In addition, the 2010 ADA Standards for Accessible Design requires that interior doors must open with no more than five pounds of force, further demonstrating the reasonableness of Ms. Weiss’s accommodation request. *See* n.3.

205. From the time of Ms. Weiss’s reasonable accommodation request, DCPL failed to provide an effective alternative. At various points between 2022 and 2023, DCPL made temporary modifications and adjustments to the relevant doors; however, these changes were temporary and insufficient.

206. By failing to provide Ms. Weiss with the reasonable accommodation of automatic door openers and/or reduction of tension at each door that Ms. Weiss uses in the performance of her job duties and with equal access as her nondisabled peers, DCPL has discriminated against

Ms. Weiss on the basis of disability in violation of the ADA. 42 U.S.C. § 12112(b)(5)(A); 29 C.F.R. § 1630.2(o)(1)(iii).

207. DCPL also failed to engage in a good-faith interactive process required to determine reasonable accommodations for Ms. Weiss. From the time of her request, DCPL has ignored Ms. Weiss for extended periods, provided incomplete updates, and delayed the process by asking Ms. Weiss to obtain unnecessary medical documentation. DCPL also did not offer effective alternative accommodations that would have provided Ms. Weiss with equal benefits and privileges of employment.

208. By failing to engage in a good-faith interactive process to provide reasonable accommodations for Ms. Weiss, DCPL has discriminated against Ms. Weiss on the basis of disability. 42 U.S.C. §§ 12112(a); 12112(b)(5)(A).

209. By requiring Ms. Weiss to provide unnecessary medical documentation before they would process her reasonable accommodation request, DCPL discriminated against Ms. Weiss on the basis of disability. 42 U.S.C. § 12112(d)(1).

210. DCPL also created unnecessary forms and questionnaires in order for Ms. Weiss to request a reasonable accommodation, which resulted in delays and denials of her reasonable accommodation request. By requiring Ms. Weiss to submit an internal DCPL questionnaire, DCPL has utilized standards, criteria, or methods of administration that have the effect of discriminating against Ms. Weiss on the basis of disability. 42 U.S.C. §§ 12112(a); 12112(b)(3)(A).

211. DCPL's violations of the ADA have caused, and continue to cause, Ms. Weiss to suffer discrimination, bodily injuries, emotional pain and suffering, and damage to her wheelchair.

Count Two
Violations of Section 504 of the Rehabilitation Act – Reasonable Accommodations
29 U.S.C. § 794

212. Plaintiff incorporates by reference the allegations in paragraphs 1 through 194 as though fully set forth herein.

213. Section 504 provides that “[n]o otherwise qualified individual with a disability . . . shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 29 U.S.C. § 794(a).

214. Section 504 incorporates ADA standards and requires employers to “mak[e] reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability.” 42 U.S.C. § 12112(b)(5)(A); 29 U.S.C. § 794(d).

215. DCPL is required to comply with Section 504 because it is a recipient of federal financial assistance and has been a recipient at all times relevant to the claims asserted in this Complaint.

216. Ms. Weiss is a qualified individual with a disability. She is diagnosed with spastic cerebral palsy which requires a wheelchair for mobility. Her disability constitutes a physical impairment which substantially limits her ability to walk, which constitutes a major life activity. 42 U.S.C. § 12102.

217. Ms. Weiss applied for, was interviewed for, and has been working for DCPL as a Digital Navigator for four years, providing professional services such as helping patrons locate digital information and assisting them with access to computers or electronic resources. She therefore satisfies the requisite skill, experience, and other requirements necessary to perform the

essential functions and is qualified for the job of Digital Navigator at DCPL. 29 C.F.R. § 1630.2(m).

218. DCPL had notice of Ms. Weiss’s disability and need for reasonable accommodation at the time of onboarding. Ms. Weiss’s disability was obvious, notwithstanding the medical documentation she provided on the District of Columbia Employment Applicant Identification Sheet and communications provided to multiple staff at DCPL about her disability.

219. Ms. Weiss communicated that she had a disability and the need for reasonable accommodations through verbal and written communication with DCPL. She began requesting reasonable accommodation regarding automatic opening capabilities of certain doors in the MLK Library in May 2022. She has followed up on this request and demonstrated her need for reasonable accommodations to the DCPL HR Director and ADA Coordinator multiple times since 2022.

220. Reasonable accommodations include “making existing facilities used by employees readily accessible to and usable by individuals with disabilities.” 42 U.S.C. § 12111(9)(A). They further extend to “[m]odifications or adjustments that enable . . . [an] employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by [the employer’s] other similarly situated employees without disabilities.” 29 C.F.R. § 1630.2(o)(1)(iii).

221. Ms. Weiss’s request is reasonable and does not impose an undue burden on DCPL. For example, upgrades to certain doors demonstrate that DCPL possesses the necessary funding, authority, and operational capacity to conduct building modifications and implement Ms. Weiss’s requested accommodation. 42 U.S.C. § 12112(b)(5)(A).

222. From the time of Ms. Weiss's reasonable accommodation request, DCPL failed to provide an effective alternative. At various points between 2022 and 2023, DCPL made temporary modifications and adjustments to the relevant doors; however, these changes were insufficient as demonstrated by Ms. Weiss's continuous injuries to herself and her wheelchair.

223. By failing to provide Ms. Weiss with the reasonable accommodation of automatic door openers and/or reduction of tension at each door that Ms. Weiss uses in the performance of her job duties, DCPL has discriminated against Ms. Weiss on the basis of disability in violation of Section 504 of the Rehabilitation Act. 42 U.S.C. § 12112(b)(5)(A); 29 C.F.R. § 1630.2(o)(1)(iii).

224. DCPL also failed to engage in a good-faith interactive process required to determine reasonable accommodations for Ms. Weiss. From the time of her request, DCPL has ignored Ms. Weiss for extended periods, provided incomplete updates, and delayed the process by asking Ms. Weiss to obtain unnecessary medical documentation. DCPL also did not offer effective alternative accommodations that would have provided Ms. Weiss with equal benefits and privileges of employment.

225. By failing to engage in a good-faith interactive process to provide reasonable accommodations for Ms. Weiss, DCPL has discriminated against Ms. Weiss on the basis of disability. 42 U.S.C. §§ 12112(a); 12112(b)(5)(A).

226. DCPL also created unnecessary forms and questionnaires in order for Ms. Weiss to request a reasonable accommodation, which resulted in delays and denials of her reasonable accommodation request. By requiring Ms. Weiss to obtain medical documentation and fill out DCPL's internal form for an obvious disability, DCPL discriminated against Ms. Weiss on the basis of disability. 42 U.S.C. § 12112(d)(1); 29 C.F.R. pt. 1630 app. § 1630.9 (1997).

227. This failure to provide a reasonable accommodation violates Section 504 of the Rehabilitation Act. In failing to provide equitable access to locations in the workplace necessary for Ms. Weiss to perform her job, DCPL denied Ms. Weiss the opportunity to enjoy equal benefits and privileges of employment as are enjoyed by other employees, subjecting her to discrimination based solely on her disability.

228. DCPL's violations of Section 504 have caused Plaintiff to suffer discrimination, bodily injuries, emotional pain and suffering, and damage to her wheelchair.

Count Three
Violations of D.C. Human Rights Act – Failure to Accommodate
D.C. Code §§ 2-1401.01 *et seq.*

229. Plaintiff incorporates by reference the allegations in paragraphs 1 through 194 as though fully set forth herein.

230. The DCHRA, D.C. Code §§ 2-1401.01 *et seq.*, prohibits discrimination on the basis of disability by an employer. D.C. Code § 2-1402.11(a)(1)(A).

231. Ms. Weiss is an individual with a disability. She has spastic cerebral palsy which requires a wheelchair for mobility. She therefore has a physical impairment which substantially limits her ability to walk, which constitutes a major life activity. D.C. Code § 2-1401.02(5A).

232. DCPL is a covered employer. D.C. Code § 2-1401.02(10).

233. Ms. Weiss applied for, was interviewed for, and has been working for DCPL as a Digital Navigator for four years. She therefore satisfies the requisite skill, experience, and other requirements necessary to perform the essential functions and is qualified for the job of Digital Navigator at DCPL.

234. Ms. Weiss communicated that she had a disability and the need for reasonable accommodations through verbal and written communication with DCPL. She began requesting

reasonable accommodation regarding automatic opening capabilities of certain doors in the MLK Library in May 2022. She has followed up on this request and demonstrated her need for reasonable accommodations to the DCPL HR Director and ADA Coordinator multiple times since 2022.

235. Ms. Weiss's request is reasonable and does not impose an undue burden on DCPL. For example, upgrades to certain doors demonstrate that DCPL possesses the necessary funding, authority, and operational capacity to conduct building modifications and implement Ms. Weiss's requested accommodation.

236. By failing to provide Ms. Weiss with the reasonable accommodation of automatic door openers and/or reduction of tension at each door that Ms. Weiss uses in the performance of her job duties, DCPL has discriminated against Ms. Weiss on the basis of disability in violation of the DCHRA D.C. Code § 2-1402.11(a)(1)(A).

237. DCPL also failed to engage in a good-faith interactive process required to determine reasonable accommodations for Ms. Weiss. From the time of her request, DCPL has ignored Ms. Weiss for extended periods, provided incomplete updates, and delayed the process by asking Ms. Weiss to obtain unnecessary medical documentation. DCPL also did not offer effective alternative accommodations that would have provided Ms. Weiss with equal benefits and privileges of employment.

238. By failing to engage in a good-faith interactive process to provide reasonable accommodations for Ms. Weiss, DCPL has been discriminating against Ms. Weiss on the basis of disability in violation of the DCHRA.

239. DCPL also created unnecessary forms and questionnaires in order for Ms. Weiss to request a reasonable accommodation, which resulted in delays and denials of her reasonable

accommodation request. By requiring Ms. Weiss to submit a medical questionnaire and provide medical documentation before they would process her reasonable accommodation request, DCPL discriminated against Ms. Weiss on the basis of disability in violation of the DCHRA.

240. DCPL's violations of the DCHRA have caused Plaintiff to suffer discrimination, bodily injuries, emotional pain and suffering, and damage to her wheelchair.

241. DCPL's conduct in denying Ms. Weiss reasonable accommodation for over four years and failing to engage in the interactive process was malicious, wanton, reckless, and in willful disregard of her rights, and thus entitles her to punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in Plaintiff's favor and grant the following relief:

- A. Entering judgment in favor of Ms. Weiss;
- B. Entering a declaratory judgment finding that Ms. Weiss has been deprived of reasonable accommodations to which she is entitled by nature of her disability under Title I of the ADA, Section 504 of the Rehabilitation Act, and the D.C. Human Rights Act;
- C. Granting a permanent injunction enjoining DCPL from engaging in employment practices that discriminate on the basis of disability, requiring DCPL to bring the doors at issue in this complaint into compliance with the ADA and requiring DCPL to implement or update policies and procedures for receiving, evaluating, documenting, and responding to requests for reasonable accommodation that will prevent recurrence of the violations experienced by Ms. Weiss;
- D. Awarding Ms. Weiss compensatory damages, including but not limited to emotional distress and physical injuries, in an amount to be determined at trial under the D.C.

Human Rights Act, and compensatory damages, including but not limited to physical injuries, in an amount to be determined at trial under Section 504 of the Rehabilitation Act;

- E. Awarding Ms. Weiss punitive damages under the D.C. Human Rights Act;
- F. Awarding Ms. Weiss reasonable attorneys' fees, together with the costs of litigation, under Title I of the ADA, Section 504 of the Rehabilitation Act, and the D.C. Human Rights Act; and
- G. Such other and further relief as the Court deems just and proper.

REQUEST FOR JURY TRIAL

Plaintiff requests a trial by jury on all issues of fact and measure of damages.

Dated: July 29, 2026

Respectfully submitted,

/s/Harmony Jones

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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

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

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

DEFENDANTS

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)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 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 | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 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 - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

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

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff(s)

v.

Defendant(s)

)
)
)
)
)
)
)
)
)
)
)
)

Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, 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.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))***

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

for the

District of

Plaintiff(s)

V.

Civil Action No. 1:26-cv-2662

Defendant(s)

To: *(Defendant's name and address)*

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, 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.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))***

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: