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7 RECEIVED AND RETURNED  
8 CLERK, U.S. DISTRICT COURT  
9 JAN - 5 2001  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 DEPUTY

12 FILED  
13 CLERK, U.S. DISTRICT COURT  
14 JAN 16 2001  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 BY  
17 DEPUTY

18 UNITED STATES DISTRICT COURT  
19 CENTRAL DISTRICT OF CALIFORNIA

20 STEPHANIE VAN VUREN,

21 Plaintiff,

22 v.

23 UNIVERSAL CITY STUDIOS, INC.,  
24 UNIVERSAL STUDIOS HOLLYWOOD,  
25 UNIVERSAL STUDIOS, INC., and  
26 DOES ONE to TEN, inclusive,

27 Defendants.

28 Case No. 01-00464 WMB (CTx)

Civil Rights

COMPLAINT FOR INJUNCTIVE RELIEF AND  
DAMAGES: DENIAL OF CIVIL RIGHTS OF A  
DISABLED PERSON IN VIOLATION OF THE  
AMERICANS WITH DISABILITIES ACT OF  
1990; VIOLATION OF CALIFORNIA'S CIVIL  
RIGHTS STATUTES

DEMAND FOR JURY TRIAL

Plaintiff STEPHANIE VAN VUREN complains of defendants UNIVERSAL CITY  
STUDIOS, INC., UNIVERSAL STUDIOS HOLLYWOOD, UNIVERSAL STUDIOS, INC.,  
and DOES ONE to TEN, inclusive, and DOES ONE to TEN, inclusive,

follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction of this action pursuant to 28 USC § 1331 for  
violations of the *Americans with Disabilities Act of 1990*, (42 USC § 12101, et seq.)  
Pursuant to pendant jurisdiction, attendant and related causes of action, arising from the  
same facts, are also brought under California law, including but not limited to violations of

ENTERED ON ICMS  
JAN 18 2001  
CV

1 **California Health & Safety Code** § 19955, *et seq.*, including **California Code of**  
2 **Regulations**, Title 24, § 19959, **California Civil Code** §§ 51, 51.5, 52(a), 52.1, 54, 54.1,  
3 54.3 and 55.

4 2. Venue is proper in this court pursuant to 28 **USC** § 1391(b) and is founded on  
5 the fact that the real property which is the subject of this action is located in this district, at  
6 Universal City, California, and that Plaintiff's causes of action arose in this district.

### 7 INTRODUCTION

8  
9 3. **UNIVERSAL STUDIOS HOLLYWOOD** is located at 100 Universal City Plaza,  
10 Universal City, California. Said theme park is owned and operated by defendants  
11 **UNIVERSAL CITY STUDIOS, INC., UNIVERSAL STUDIOS HOLLYWOOD, UNIVERSAL**  
12 **STUDIOS, INC., and DOES ONE to TEN, inclusive.**

13 Defendants **UNIVERSAL CITY STUDIOS, INC., UNIVERSAL STUDIOS**  
14 **HOLLYWOOD, UNIVERSAL STUDIOS, INC., and DOES ONE to TEN, inclusive, and**  
15 **DOES ONE to TEN, inclusive,** operate an establishment for services to the public and at  
16 which Defendants failed to provide barrier free access to said establishment in conformity  
17 with both Federal and California legal requirements. Further, Defendants failed to provide  
18 compliance as follows:  
19

#### 20 **A. NOTIFICATION**

21  
22 There is no sign at the entrance to the park or at the ticket booths that  
23 provides notification of the availability of an assistive listening system in  
24 violation of California Title 24 § 1104B.2.4 and ADAAG 4.1.3(19)(b).

#### 25 **B. AUDIBLY INACCESSIBLE RIDES**

26  
27 The Guest Services Office provides an assistive listening device but  
28 advises it does not work for any of the rides, only for the shows.

1 a result of the failure to provide proper accessible public facilities, Plaintiff **STEPHANIE**  
2 **VAN VUREN** was denied her civil rights, including her right to full and equal access to public  
3 facilities, was embarrassed and humiliated, suffered physical, psychological and mental  
4 injuries and emotional distress, mental distress, mental suffering, mental anguish, which  
5 includes shame, humiliation, embarrassment, anger, chagrin, disappointment and worry,  
6 expectedly and naturally associated with a person with a physical disability being denied  
7 access to a public accommodation.  
8

9 WHEREFORE, Plaintiff prays for damages as hereinafter stated.

10 **III. THIRD CAUSE OF ACTION**

11 **VIOLATION OF CALIFORNIA'S CIVIL RIGHTS ACTS**

12 (On Behalf of Plaintiff **STEPHANIE VAN VUREN** and Against Defendants  
13 **UNIVERSAL CITY STUDIOS, INC., UNIVERSAL STUDIOS HOLLYWOOD,**  
14 **UNIVERSAL STUDIOS, INC., and DOES ONE to TEN, inclusive) (*California***

15 *Civil Code* §§ 54, 54.1 and 54.3)

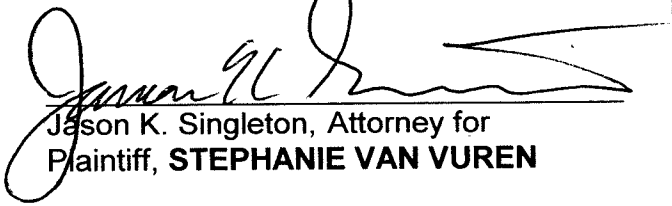
16 49. Plaintiff repleads and incorporates by reference as if fully set forth again  
17 herein, the allegations contained in paragraphs 1 through 48 of this Complaint and  
18 incorporates them herein as if separately repled.

19 50. The public facilities above-described constitute public facilities and public  
20 accommodations within the meaning of *California Health & Safety Code* § 19955 *et seq.*  
21 and were facilities to which members of the public are invited. The aforementioned acts  
22 and omissions of defendants, and each of them, constitute a denial of equal access to and  
23 use and enjoyment of these facilities by persons with disabilities, including Plaintiff  
24 **STEPHANIE VAN VUREN**. Said acts and omissions are also in violation of provisions of  
25 Title 24 of the *California Code of Regulations*.

26 51. The rights of Plaintiff, the entitlement of Plaintiff to full and equal access and  
27 the denial by defendants of such rights and entitlements are set forth in *California Civil*  
28 *Code* §§ 54, 54.1 and 54.3, to wit:

8. Grant such other and further relief as the court may deem just and proper.

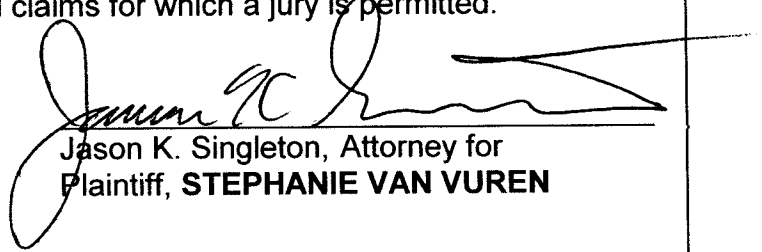
1  
2 Dated: December 14, 2000

  
Jason K. Singleton, Attorney for  
Plaintiff, **STEPHANIE VAN VUREN**

3  
4  
5 **DEMAND FOR JURY TRIAL**

6 Plaintiffs hereby request a jury for all claims for which a jury is permitted.

7  
8 Dated: December 14, 2000

  
Jason K. Singleton, Attorney for  
Plaintiff, **STEPHANIE VAN VUREN**