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7 **Attorneys for Plaintiff, ANNA ESCOBEDO**

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.

AUG 7 12 17 PM '02

FILED

10 **ANNA ESCOBEDO,**

) **Case No. 02 - 6161 LGB**

JTLx

11 **Plaintiff,**

) **Civil Rights**

12 **v.**

) **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**

13 **RKK HOSPITALITY LLC, a**
14 **California Limited Liability**
15 **Company, dba SAN LUIS OBISPO**
16 **TRAVELODGE; and DOES ONE TO**
17 **TEN, inclusive,**

18 **Defendants.**

) **JURY TRIAL REQUESTED**

ENTERED ON ICMS
AUG - 9 2002
CV

19
20
21 **Plaintiff ANNA ESCOBEDO complains of defendants RKK HOSPITALITY**
22 **LLC, a California Limited Liability Company, dba SAN LUIS OBISPO**
23 **TRAVELODGE, and DOES ONE TO TEN, inclusive, and alleges as follows:**

24 **JURISDICTION AND VENUE**

25
26 1. The Court has jurisdiction of this action pursuant to 28 **USC** § 1331 for
27 violations of the **Americans with Disabilities Act of 1990**, (42 **USC** § 12101, et
28 seq.) Pursuant to pendant jurisdiction, attendant and related causes of action,

1 arising from the same facts, are also brought under California law, including but
2 not limited to violations of **California Health & Safety Code § 19955, et seq.**,
3 including **California Code of Regulations, Title 24, § 19959, California Civil**
4 **Code §§ 51, 51.5, 52(a), 52.1, 54, 54.1, 54.3 and 55.**

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

11 INTRODUCTION

13 3. The **SAN LUIS OBISPO TRAVELODGE** is located at 1825 Monterey
14 Street, San Luis Obispo, California. Said motel is owned and operated by
15 defendants **RKK HOSPITALITY LLC, a California Limited Liability Company,**
16 **dba SAN LUIS OBISPO TRAVELODGE, and DOES ONE TO TEN, inclusive.**

18 Defendants **RKK HOSPITALITY LLC, a California Limited Liability**
19 **Company, dba SAN LUIS OBISPO TRAVELODGE, and DOES ONE TO TEN,**
20 **inclusive,** operate an establishment for services to the public and at which
21 Defendants failed to provide barrier free access to said establishment in
22 conformity with both Federal and California legal requirements. Further,
23 Defendants failed to provide compliance as follows:

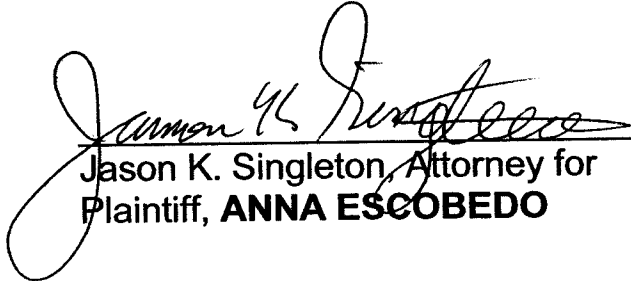
26 **A. Parking**

27 1. Van Parking. A van accessible parking space is not provided as
28

1 all reasonable attorneys' fees as provided by law, including but not limited to those
2 recoverable pursuant to the provisions of **California Civil Code** §§ 52, 54.3, and
3
4 **55, California Code of Civil Procedure** § 1021.5, and **Americans with**
5 **Disabilities Act of 1990** §308 of Title III; and

6 8. Grant such other and further relief as the court may deem just and
7
8 proper.

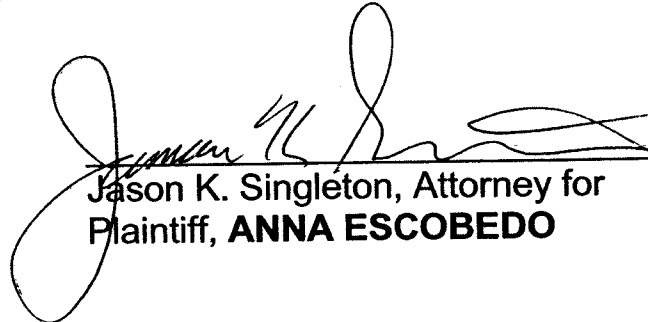
9 Dated: July 24, 2002


Jason K. Singleton, Attorney for
Plaintiff, **ANNA ESCOBEDO**

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11
12 **REQUEST FOR JURY TRIAL**

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14 Plaintiff hereby requests a jury for all claims for which a jury is permitted.

15
16 Dated: July 24, 2002


Jason K. Singleton, Attorney for
Plaintiff, **ANNA ESCOBEDO**