

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

<hr/>		)	
SAMUEL SILBER; SIDNEY EDDY	)	)	
STRULOVITS; SHERI LYNN	)	)	
STRULOVITS; MOSHE GORDON;	)	)	
DANIEL JACOB; TSOFIYA JACOB;	)	)	C.A. No. _____
LEWIS WEINGER; MORIYAH	)	)	
SHAPIRO; JONATHAN SHAPIRO;	)	)	
INBAL NAZDARE LEVY; YAIR	)	)	JURY TRIAL DEMANDED
SPOLTER; ERIC CHARLES MARX;	)	)	
SUSAN LYNN MARX; ALON MADIEL;	)	)	
DANIELLE MADIEL; GULIE MADIEL;	)	)	
HOWARD RABIN; and JEFFREY T.	)	)	
SCHWARTZ,	)	)	
	)	)	
	Plaintiffs,	)	
		)	
	v.	)	
		)	
AIRBNB, Inc.,	)	)	
	)	)	
	Defendant.	)	
		)	
<hr/>		)	

**COMPLAINT**

Plaintiffs, complaining of the defendant, by and through their undersigned attorneys, allege for their complaint against the defendant, upon information and belief, as follows:

**NATURE OF THE ACTION**

1. This is a complaint for monetary damages, and declaratory and injunctive relief against Airbnb to enforce the provisions of The Fair Housing Act, Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Amendments Act of 1988, (“FHA”) 42 U.S.C. § 3601, *et seq.*

## **THE PARTIES**

### **A. The Plaintiffs**

2. Plaintiff Samuel Silber is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Samuel Silber owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

3. Plaintiff Sidney Eddy Strulovits is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Sidney Eddy Strulovits owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

4. Plaintiff Sheri Lynn Strulovits is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Sheri Lynn Strulovits owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

5. Plaintiff Moshe Gordon is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Moshe Gordon owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

6. Plaintiff Daniel Jacob is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Daniel Jacob owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

7. Plaintiff Tsofiya Jacob is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Tsofiya Jacob owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

8. Plaintiff Lewis Weinger is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Lewis Weinger owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

9. Plaintiff Moriyah Shapiro is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Moriyah Shapiro owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

10. Plaintiff Jonathan Shapiro is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Jonathan Shapiro owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

11. Plaintiff Inbal Nazdare Levy is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Inbal Nazdare Levi owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

12. Plaintiff Yair Spolter is a dual citizen of the United States and Israel, domiciled in Israel. At all times relevant hereto, Yair Spolter owned and continues to own residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

13. Plaintiff Eric Charles Marx is a citizen of the United States domiciled in Maryland. Prior to November 19, 2018, Eric Charles Marx regularly used Airbnb’s brokerage and booking services to rent residential property in an area that Airbnb classifies as “Israeli settlements in the occupied West Bank,” and he desires to continue to use Airbnb’s services to rent residential property in said area.

14. Plaintiff Susan Lynn Marx is a citizen of the United States domiciled in Maryland. Prior to November 19, 2018, Susan Lynn Marx regularly used Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank," and she desires to continue to use Airbnb's services to rent residential property in said area.

15. Plaintiff Alon Madiel is a dual citizen of the United States and Israel, domiciled in Israel. Alon Madiel desires to use Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank."

16. Plaintiff Danielle Madiel is a dual citizen of the United States and Israel, domiciled in Israel. Danielle Madiel desires to use Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank."

17. Plaintiff Gulie Madiel is a dual citizen of the United States and Israel, domiciled in Israel. Gulie Madiel desires to use Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank."

18. Plaintiff Howard Rabin is a citizen of the United States domiciled in New York. Howard Rabin desires to use Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank."

19. Plaintiff Jeffrey T. Schwartz is a citizen of the United States domiciled in New York. Jeffrey T. Schwartz desires to use Airbnb's brokerage and booking services to rent residential property in an area that Airbnb classifies as "Israeli settlements in the occupied West Bank."

**B. The Defendant**

20. Airbnb, Inc. (“Airbnb”) is a Delaware corporation. Airbnb’s registered agent for service of process in Delaware is the Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

**JURISDICTION AND VENUE**

21. Pursuant to Fed. R. Civ. P. 4(h), Fed. R. Civ. P. 4(k)(1), and Delaware law, as a Delaware corporation, Airbnb is subject to personal jurisdiction in this Court and can be served through its registered agent for service of process in Delaware.

22. This Court has subject matter jurisdiction in this action pursuant to 28 U.S.C. § 1331, as Plaintiffs assert federal claims under the FHA; under 28 U.S.C. § 1343(a)(4) as Plaintiffs seek to secure equitable and other relief under federal civil rights laws; and under 42 U.S.C. § 3613(a)(1)(A) as Plaintiffs seek appropriate relief regarding a discriminatory housing practice under the Fair Housing Act.

23. Plaintiffs seek declaratory and injunctive relief as authorized by 28 U.S.C. §§ 2201 and 2202.

24. Venue is proper in this District under 28 U.S.C. § 1391(b) (1), as Defendant Airbnb resides in this District in which it is subject to the Court’s personal jurisdiction.

**FACTUAL ALLEGATIONS**

25. Airbnb operates a booking and brokerage service related to the business of renting residential dwellings and other public accommodations.

26. Airbnb’s booking platform serves as a facility related to the business of renting residential dwellings.

27. Airbnb structures its business as a membership organization, generally requiring users to register as “members” of the organization in order to utilize its booking and brokerage services.

28. Airbnb generally charges a commission for each booking confirmed through its services.

29. Airbnb touts itself as a “global” company, and it facilitates the ability of owners of residential dwellings to engage in the business of renting residential dwellings to members in many countries around the world, including the United States.

30. Prior to November 19, 2018, Airbnb publicly asserted that it followed a policy of non-discrimination on the basis of race, religion, national origin, ethnicity, disability, sex, gender identity, sexual orientation, or age.

31. Prior to November 19, 2018, based upon its non-discrimination policy, Airbnb rebuffed calls by the Boycott, Divestment and Sanctions Movement (the “BDS Movement”) and other anti-Israel and anti-Semitic organizations and activists to refuse to provide its platform and services to Jews and/or Israelis seeking to offer their residential dwellings for rent in the disputed territories known as the “West Bank.”

32. Prior to November 19, 2018, Airbnb publicly asserted that it was permitted by law to provide its platform and services to Jews and Israelis in these areas, and that it would continue to do so.

33. On November 19, 2018, Airbnb announced its decision to “remove listings in Israeli settlements in the occupied West Bank that are at the core of the dispute between Israelis and Palestinians.”

34. Airbnb made this decision knowing that the listings it would be excluding would be for residential properties owned predominately, if not exclusively, by Jews and/or Israelis.

35. Upon information and belief, Airbnb's decision to remove such listings was made in response to calls by individuals and entities aligned and affiliated with the BDS Movement, which is recognized as an anti-Israel and anti-Semitic organization that targets Jews and Israelis for discrimination and exclusion from economic, academic, and cultural organizations and activity.

36. Airbnb's removal of listings "in Israeli settlements in the occupied West Bank" serves to limit and deny the owners of dwellings in these areas access to, and/or participation in, Airbnb's booking and brokerage services, organization, and facilities and other services related to the business of renting their residential dwellings.

37. Airbnb's removal of listings "in Israeli settlements in the occupied West Bank" serves to limit and deny prospective renters access to these dwellings and/or participation in Airbnb's booking and brokerage services, organization, and facilities and other services related to the business of renting residential dwellings.

38. In contrast, Airbnb continues to permit and include listings in non-Israeli and non-Jewish settlements and dwellings in "the occupied West Bank," thus providing the owners and prospective renters of these dwellings access to, and participation in, Airbnb's booking and brokerage services, organization, and facilities and other services related to the business of renting those dwellings.

39. Airbnb's decision to remove listings "in Israeli settlements in the occupied West Bank" discriminates against Jews and/or Israelis on its face and in effect on the basis of race, religion and national origin.

40. Plaintiffs Samuel Silber, Sidney Eddy Strulovits, Sheri Lynn Strulovits, Moshe Gordon, Daniel Jacob, Tsofiya Jacob, Lewis Weinger, Moriya Shapiro, Jonathan Shapiro, Inbal Nazdare Levy, and Yair Spolter are all Jewish Israelis who own residential dwellings in areas that Airbnb classifies as “Israeli settlements in the occupied West Bank,” and who have used Airbnb’s brokerage and booking services, organization, and facilities to rent out these properties prior to November 19, 2018. These Plaintiffs desire to continue to use such services to rent these properties, but Airbnb’s discriminatory policy and practice now serves to limit and deny them the ability to do so.

41. Plaintiffs Eric Marx and Susan Lynn Marx are Jewish individuals who have regularly used Airbnb's brokerage and booking services prior to November 19, 2018 to rent a residential dwelling in the areas now excluded by Airbnb, and they are now unable to do so due to Airbnb’s discriminatory policy and practice.

42. Plaintiffs Alon Madiel, Danielle Madiel and Gulie Madiel, Howard Rabin and Jeffrey T. Schwartz are also Jewish individuals who desire to use Airbnb’s brokerage and booking service to rent residential dwellings in the areas now excluded by Airbnb, and are now unable to do so due to Airbnb’s discriminatory policy and practice.

43. Plaintiffs have been injured and continue to be injured and suffer damage by Airbnb’s illegal and discriminatory practice and policy of excluding from its brokerage and booking services and platform properties located in areas that Airbnb classifies as “Israeli settlements in the occupied West Bank.”

**CLAIM FOR RELIEF**  
**(VIOLATIONS OF THE FAIR HOUSING ACT)**

44. Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.



45. Airbnb operates an online business that provides a platform and listing service for individuals to list, discover and rent both short and long-term accommodations and dwellings.

46. The homes and properties including those listed or referred to above, are “dwellings” within the meaning of 42 U.S.C. § 3602(b).

47. Airbnb’s actions violate the provisions of 42 U.S.C. § 3606 which states in pertinent part:

it shall be unlawful to deny any person access to or membership or participation in any multiple-listing service, real estate brokers’ organization or other service, organization, or facility relating to the business of selling or renting dwellings, or to discriminate against him in the terms or conditions of such access, membership, or participation, on account of race, color, religion, sex, handicap, familial status, or national origin.

*Id.*

48. Airbnb’s actions also violate the provisions of 42 U.S.C. § 3617 which provides in pertinent part that:

it shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his having exercised or enjoyed, or on account of his having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by section 3603, 3604, 3605, or 3606 of this title.

*Id.*

49. Airbnb’s actions described above constitute:

a) discrimination on account of race, religion and national origin in the denial of access to, membership and participation in a service relating to the business of renting dwellings; and

b) interference with the rights of persons in the exercise or enjoyment of, or on account of their having exercised or enjoyed, or on account of their having aided or encouraged persons in the exercise or enjoyment of rights granted or protected by the FHA. Airbnb acted intentionally, willfully, and in disregard of the federally protected rights of others.

50. Plaintiffs, Jewish and/or Israeli property owners and prospective renters, who have been the victims of Airbnb's discriminatory conduct are "aggrieved persons" within the meaning of 42 U.S.C. §§ 3602(i) and have suffered harm and damages as a direct result of Airbnb's conduct. Airbnb is liable to Plaintiffs for any and all damages they have sustained as a result of such injuries.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs pray that this Court enter judgment against Defendant Airbnb as follows:

- a) Declaring that Airbnb's actions and practices violate the Fair Housing Act, 42 U.S.C. § 3601 et seq.
- b) Enjoining Airbnb from continuing to discriminate against Plaintiffs and other Jews and Israelis in the provision of its platform and services;
- c) Awarding compensatory and punitive damages to Plaintiffs from Airbnb, amounts to be determined at trial;
- d) Ordering Airbnb to pay any and all costs sustained in connection with the prosecution of this action, including attorneys' fees;
- e) Granting such other and further relief as justice requires.

**JURY DEMAND**

Plaintiffs demand a trial by jury on all issues so triable.

Dated: November 28, 2018

**KLEHR HARRISON  
HARVEY BRANZBURG LLP**

/s/ David S. Eagle

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Sean M. Brennecke (DE Bar No. 4686)  
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*Attorneys for Plaintiffs*

-and-

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*Israeli Counsel for Plaintiffs*

JS 44 (Rev. 06/17)

**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.)

<p><b>I. (a) PLAINTIFFS</b></p> <p>Samuel Silber, et al.,</p> <p><b>(b) County of Residence of First Listed Plaintiff</b> <u>Israel</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c) Attorneys (Firm Name, Address, and Telephone Number)</b> David S. Eagle (DE Bar No. 3387); Sean M. Brennecke (DE Bar No. 4686), KLEHR HARRISON HARVEY BRANZBURG LLP, 919 N. Market Street, Suite 1000, Wilmington, Delaware 19801; (302) 552-5508</p>	<p><b>DEFENDANTS</b></p> <p>Airbnb, Inc.</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) _____</p>
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<p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 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		
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	
<p><b>REAL PROPERTY</b></p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>CIVIL RIGHTS</b></p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input checked="" type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p><b>Other:</b></p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p><b>PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<p><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<p><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

**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):*  
42 U.S.C. 3601 et. seq.

Brief description of cause:  
Claim for monetary damages, and declaratory and injunctive relief under The Fair Housing Act.

**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: 11/28/2018    SIGNATURE OF ATTORNEY OF RECORD: /s/ David S. Eagle

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

OFFICE OF THE CLERK  
**UNITED STATES DISTRICT COURT**  
DISTRICT OF DELAWARE

John A. Certno  
CLERK OF COURT

844 North King Street, Unit 18  
Wilmington, DE 19801-3570  
www.ded.uscourts.gov  
(302) 573-6170

**DISTRICT OF DELAWARE**  
**LOCAL RULE 73.1**

**Magistrate Judges; Trial by Consent**

Where the parties consent, the Magistrate Judge may conduct a jury or nonjury trial in any civil action and order the entry of final judgment in accordance with 28 U.S.C. § 636 (c) and Fed. R. Civ. P. 73-76. In the course of conducting proceedings in any civil action upon the consent of the parties, a Magistrate Judge may hear and determine any an all pretrial and post-trial motions including case dispositive motions.

(a) The Clerk shall notify the parties in all cases that they may consent to have a Magistrate Judge conduct any or all proceedings in the case and order the entry of final judgment.

(b) **The Clerk shall not accept a consent form for filing unless it has been signed by all parties in a case.** Plaintiff shall be responsible for securing execution and filing of such a consent form. No consent form will be made available, nor will its contents be made known to any District Judge or Magistrate Judge, unless all stated parties have consented to the reference to a Magistrate Judge.

(c) The consent form shall be filed with the Clerk not later than the final pretrial conference, unless otherwise ordered.

(d) After the consent form has been executed and filed, the Clerk shall so advise the District Court Judge to whom the case has been assigned. At the discretion of the District Judge, the Clerk shall prepare, for the District Judge's signature, an order referring the case to the Magistrate Judge. Once the case has been referred, the Magistrate Judge shall have the authority to conduct any and all proceedings to which the parties have consented and to direct the Clerk to enter a final judgment in the same manner as if a District Judge presided.

AO 85 (Rev. 01/09) Notice, Consent, and Reference of a Civil Action to a Magistrate Judge

UNITED STATES DISTRICT COURT
for the
District of Delaware

Plaintiff
v.
Defendant
Civil Action No.

NOTICE, CONSENT, AND REFERENCE OF A CIVIL ACTION TO A MAGISTRATE JUDGE

Notice of a magistrate judge's availability. A United States magistrate judge of this court is available to conduct all proceedings in this civil action (including a jury or nonjury trial) and to order the entry of a final judgment. The judgment may then be appealed directly to the United States court of appeals like any other judgment of this court. A magistrate judge may exercise this authority only if all parties voluntarily consent.

You may consent to have your case referred to a magistrate judge, or you may withhold your consent without adverse substantive consequences. The name of any party withholding consent will not be revealed to any judge who may otherwise be involved with your case.

Consent to a magistrate judge's authority. The following parties consent to have a United States magistrate judge conduct all proceedings in this case including trial, the entry of final judgment, and all post-trial proceedings.

Table with 3 columns: Parties' printed names, Signatures of parties or attorneys, Dates. Includes four rows of blank lines for entry.

Reference Order

IT IS ORDERED: This case is referred to a United States magistrate judge to conduct all proceedings and order the entry of a final judgment in accordance with 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73.

Date:

District Judge's signature

Printed name and title

Note: Return this form to the clerk of court only if you are consenting to the exercise of jurisdiction by a United States magistrate judge. Do not return this form to a judge.

AO 85A (Rev. 01/09) Notice, Consent, and Reference of a Dispositive Motion to a Magistrate Judge

UNITED STATES DISTRICT COURT

for the
District of Delaware

Plaintiff
v.
Defendant
Civil Action No.

NOTICE, CONSENT, AND REFERENCE OF A DISPOSITIVE MOTION TO A MAGISTRATE JUDGE

Notice of a magistrate judge's availability. A United States magistrate judge of this court is available to conduct all proceedings and enter a final order dispositive of each motion. A magistrate judge may exercise this authority only if all parties voluntarily consent.

You may consent to have motions referred to a magistrate judge, or you may withhold your consent without adverse substantive consequences. The name of any party withholding consent will not be revealed to any judge who may otherwise be involved with your case.

Consent to a magistrate judge's consideration of a dispositive motion. The following parties consent to have a United States magistrate judge conduct any and all proceedings and enter a final order as to each motion identified below (identify each motion by document number and title).

Motions:

Parties' printed names Signatures of parties or attorneys Dates

Reference Order

IT IS ORDERED: The motions are referred to a United States magistrate judge to conduct all proceedings and enter a final order on the motions identified above in accordance with 28 U.S.C. § 636(c).

Date:

District Judge's signature

Printed name and title

Note: Return this form to the clerk of court only if you are consenting to the exercise of jurisdiction by a United States magistrate judge. Do not return this form to a judge.