

JUDGE DANIELS

11 CIV 0237

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER NOEL, SIMI LINTON,
UNITED SPINAL, a nonprofit organization,
THE TAXIS FOR ALL CAMPAIGN, a
nonprofit organization, 504 DEMOCRATIC
CLUB, a nonprofit organization, DISABLED
IN ACTION, a nonprofit organization

Plaintiffs,

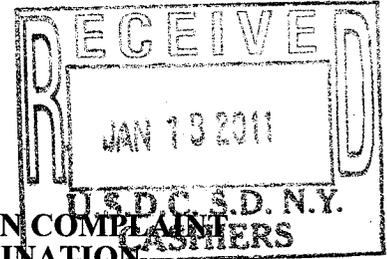
-against-

NEW YORK CITY TAXI AND
LIMOUSINE COMMISSION, a charter
mandated agency, and DAVID YASSKY, in
his official capacity as chairman and
commissioner of the New York City Taxi
and Limousine Commission,

Defendants.

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: Case no.

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: **CLASS ACTION COMPLAINT
FOR DISCRIMINATION
INJUNCTIVE AND
DECLARATORY RELIEF**



INTRODUCTION

1. This class action lawsuit challenges pervasive and ongoing discrimination by the New York City Taxi and Limousine Commission ("Taxi Commission") and Taxi Commission Chairman and Commissioner David Yassky (together "Defendants"), against residents of and visitors to New York City with mobility disabilities who need and want to use New York City medallion taxis.

2. Only 1.8% of the medallion taxis under the jurisdiction of the Taxi Commission are accessible to men, women, and children with mobility disabilities. As a result, neither disabled residents nor disabled tourists are able to hail a medallion taxi in the way that their nondisabled peers do.

