

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

DISTRICT OF COLUMBIA,
a municipal corporation,
400 Sixth Street, N.W.
Washington, D.C. 20001,

Plaintiff,

v.

**LEND A BOX MOVING SUPPLIES,
LLC, d/b/a/ LEND A BOX, LLC, f/k/a
CHANTILLY MOVING SUPPLIES,
LLC**
4265 Brookfield Corporate Drive
Suite D
Chantilly, VA 20151,

Serve on:

Stephanie Zimmerman
Registered Agent
4265 Brookfield Corporate Drive
Suite D
Chantilly, VA 20151,

Defendant.

Case No.:

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff the District of Columbia (the District) brings this action against defendant Lend A Box Moving Supplies, LLC (Lend A Box), d/b/a Lend A Box, LLC, f/k/a Chantilly Moving Supplies, LLC, a Virginia-based moving services and supply company that operates in the District, for violating the District of Columbia Human Rights Act (DCHRA), D.C. Code §§ 2-1401.01, *et seq.*, by posting discriminatory statements and refusing to service residents in the 20020 and 20032 zip codes.

INTRODUCTION

1. The District has grown in the last several decades, but this growth has not been evenly distributed across the District. Specifically, the portions of the District east of the Anacostia River—consisting of zip codes 20020, 20019 and 20032 and Wards 7 and 8—have not benefited from the influx of wealth and corresponding increase in goods and services that have flown into the District. *See* Christina Stacy et al., *Building a Vibrant Economy in Washington, DC*, URBAN INSTITUTE 1 (Apr. 2015), https://www.urban.org/sites/default/files/publication/49166/2000187-building-a-vibrant-economy-in-washington-dc_1.pdf (finding that, despite overall increases in development across the District, Wards 7 and 8 have the fewest business, nonprofit, and government entities as compared to other District residential areas).

2. This area, not coincidentally, has the highest concentration of Black and African American residents in the District, with Wards 7 and 8 accounting for nearly half of the District’s Black and African American residents. *See* D.C. Health Matters, 2021 Demographics Summary Data for Ward: Ward 7, D.C. HEALTH MATTERS COLLABORATIVE (Jan. 2021), <https://www.dchealthmatters.org/?module=demographicdata&controller=index&action=index&id=131494§ionId=> (showing that 74,008 Black or African Americans live in Ward 7, which is approximately 23.5% of the District’s Black and African American population); D.C. Health Matters, 2021 Demographics Summary Data for Ward: Ward 8, D.C. HEALTH MATTERS COLLABORATIVE (Jan. 2021), <https://www.dchealthmatters.org/?module=demographicdata&controller=index&action=index&id=131494§ionId=>

[on=index&id=131495§ionId=](#) (showing that 73,946 Black or African Americans live in Ward 8, which is approximately 23.5% of the District’s Black and African American population).

3. Studies have shown that communities east of the Anacostia River have significantly less access to services that sustain thriving communities—including grocery stores, sit-down restaurants, pharmacies, gyms, and healthcare providers—than residents who live elsewhere in the District. *See, e.g.*, Stacy, *supra* ¶ 1 (Wards 7 and 8 have disproportionately fewer business, nonprofit, and government entities as compared to other District residential areas); Randy Smith, *Food access in D.C. is deeply connected to poverty and transportation*, D.C. POLICY CENTER (Mar. 13, 2017), <https://www.dcpolicycenter.org/publications/food-access-dc-deeply-connected-poverty-transportation/> (finding that 51% of all District food deserts are located in Ward 8 and 31% are located in Ward 7); Government of the District of Columbia Department of Health: Community Health Administration, Primary Care Bureau, *District of Columbia HPSAs and MUA/Ps re-assessed and re-designated; additional areas eligible to compete for Federal and District resources*, DC HEALTH, <https://dchealth.dc.gov/sites/default/files/dc/sites/doh/HPSA%20Designation%202012%20Update%20Announcement.pdf> (last visited Feb. 17, 2021) (identifying that Anacostia is an area with a shortage in primary care, dental, and mental health providers). In addition to the limited number of brick-and-mortar businesses in this area, services, including delivery and at-home services, are frequently less available to residents east of the Anacostia River.

4. The disparities in access to resources extend to food-delivery services, grocery deliveries, taxi services, yard-work services, and high-speed broadband internet. Even when these services are available, residents east of the Anacostia River report differential treatment, such as delivery drivers who refuse to come to their doors. *See, e.g.,* Tim Carman, *D.C. Has never had more food delivery options. Unless you live across the Anacostia River.*, WASH. POST (Apr. 2, 2018) <https://www.washingtonpost.com/news/food/wp/2018/04/02/dc-has-never-had-more-food-delivery-options-unless-you-live-across-the-anacostia-river/>.

5. Many of the disparities in access to goods and services are driven by stigma that is based on outdated crime statistics and prejudicial views of the District's Black and African American residents who live east of the Anacostia River. For example, despite persistent stigmas and stereotypes, communities east of the Anacostia River do not experience more crime compared to the rest of the District. The Metropolitan Police Department's (MPD) statistics demonstrate that the highest concentrations of crimes over the past two years occurred in neighborhoods like Columbia Heights, Shaw and Chinatown, none of which are east of the Anacostia River. *See* Government of the District of Columbia, *D.C. Atlas Crime Cards*, DISTRICT OF COLUMBIA METROPOLITAN POLICE DEPARTMENT, <https://dcAtlas.dcgis.dc.gov/crimecards/all:crimes/all:weapons/2:years/citywide:heat>; *see also* Carman, *supra* ¶ 4 (noting that, in 2017, "of the District's eight wards, only two of them had fewer crimes in the past year than Wards 7 or 8.").

6. To remedy this disparity, the DCHRA prohibits discrimination by a public accommodation based on an individual's place of residence or business. D.C. Code § 2-1402.31(a)(1). The DCHRA also requires that public accommodations treat District residents and businesses equally, regardless of their location, and prohibits a public accommodation from directly or indirectly publishing a statement that indicates it refuses or will refuse to serve an individual based on a protected trait, including place of residence. D.C. Code § 2-1402.31(a)(2).

7. Lend A Box violated the DCHRA by using its website to deny residents of the 20020 and 20032 zip codes the ability to order rental reusable moving boxes, while providing these same services via its website to residents of all other District zip codes. Most District residents could reserve and schedule rental boxes online through the company's website LendABox.com. Residents of the 20020 and 20032 zip codes, however, were met with a discriminatory statement—a large red X—next to their zip codes when they attempted to rent moving boxes, indicating that service to their area was not available. Lend A Box's website did not allow such residents to complete the transaction available to all other District residents in violation of the DCHRA.

8. The District has an interest in ensuring that businesses operating in the District serve all District residents regardless of a resident's place of residence and seeks injunctive relief and civil penalties to discourage and deter Lend A Box from engaging in these and similar discriminatory practices.

JURISDICTION

9. The Attorney General for the District of Columbia brings this action on behalf of the District of Columbia to uphold the public interest and enforce the District's antidiscrimination law. *See* D.C. Code 23-130 § 702; *District of Columbia v. ExxonMobil Oil Corp.*, 172 A.3d 412 (D.C. 2017); D.C. Code § 1-301.81(a)(1) (“The Attorney General for the District of Columbia ... shall be responsible for upholding the public interest.”).

10. This Court has subject matter jurisdiction over the claims and allegations in the Complaint. *See* D.C. Code § 11-921(a).

11. This Court has personal jurisdiction over Lend A Box because it transacted business in the District and caused tortious injury in the District by an act or omission in the District. *See* D.C. Code § 13-423.

PARTIES

12. Plaintiff District of Columbia, a municipal corporation, is represented by its chief legal officer, the Attorney General for the District of Columbia.

13. Defendant Lend A Box is a moving logistics company that is registered as a limited liability company in the Commonwealth of Virginia. Its principal place of business is 4265 Brookfield Drive, Suite D, Chantilly, Virginia 20151. Lend A Box provides services in the District and maintains offices in Arlington, Virginia; Reston, Virginia; and Raleigh, North Carolina. Lend A Box is a place of public accommodation under the DCHRA. D.C. Code § 2-1401.02(24); D.C. Bill 23-0409,

<https://lims.dccouncil.us/downloads/LIMS/43128/Meeting1/Engrossment/B23-0409-Engrossment1.pdf> (last viewed December 22, 2020).¹

FACTS

Place of Residence and Race Discrimination Under the DCHRA

14. Despite the District’s economic growth over the last decade, District-area businesses continue to neglect and even refuse to serve communities east of the Anacostia River, inflicting disproportionate harm on the District’s Black and African American residents who make up the majority of the area’s residents. Zip codes 20020 and 20032 are two of the three zip codes east of the Anacostia River and are the only two zip codes whose boundaries do not cross the River. The District has an interest in ensuring that businesses operating in the District serve all District residents, including residents east of the River.

15. Recognizing the need for broad anti-discrimination protections, the Council of the District of Columbia (the Council) passed the DCHRA “to secure an end in the District of Columbia to discrimination for any reason other than that of

¹ On December 15, 2020, the Council for the District of Columbia (Council) amended the DCHRA when it unanimously passed the Bella Evangelista and Tony Hunter Panic Defense Prohibition and Hate Crimes Response Amendment Act of 2020 (the Act). The Act clarifies Council’s intent for the DCHRA’s “places of public accommodations” definition to include entities without a physical location in the District, and “shall take effect following approval by the Mayor (or in the event of veto by the Mayor, action by the Council to override the veto), a 60-day period of congressional review as provided in section 602(c)(2) of the District of Columbia Home Rule Act, approved December 14 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(2)), and publication in the District of Columbia Register.” *Id.*

individual merit, including ... race ... and place of residence or business.” D.C. Code § 2-1401.01.

16. Acknowledging that businesses too often treat District residents differently based on where they live, the DCHRA prohibits businesses and other places of public accommodation from denying “any person the full and equal enjoyment of the ... services ... of any place of public accommodations” on the basis an individual’s “place of residence or business.” D.C. Code § 2-1402.31(a), (a)(1).

17. The Council also recognized that it is not enough to prohibit the discriminatory denial of service, but that it must prohibit all statements suggesting that services will be denied based on a protected trait. Accordingly, the DCHRA makes it illegal to publish a statement, advertisement, or sign indicating an intent to refuse service to an individual based on their race or place of residence. D.C. Code § 2-1402.31(a)(2).

18. Despite the DCHRA’s 1977 passage, businesses and other places of public accommodations continue to refuse to serve portions of the District, often with disproportionately negative consequences for the city’s Black and African American residents.

19. Almost 90% of residents in zip codes 20020 and 20032 are Black or African American. Census Reporter, “Census Reporter Profile Page for 20020,” *U.S. Census Bureau* (2018) <https://censusreporter.org/profiles/86000US20020-20020/> (last visited February 5, 2021); *See* Census Reporter, “Census Reporter Profile Page for 20032,” *U.S. Census Bureau* (2018)

<https://censusreporter.org/profiles/86000US20032-20032/> (last visited February 5, 2021).

20. By comparison, only 44% of District residents are Black or African American. *U.S. Census Bureau* (2018)

<https://censusreporter.org/profiles/05000US11001-district-of-columbia-dc/> (last visited February 5, 2021). And nearly half of the District’s Black or African American residents live in Wards 7 and 8. *See* D.C. Health Matters, *supra* ¶ 2.

21. Given the high concentration of Black and African American residents in zip codes 20020 and 20032, a refusal to serve either zip code disparately harms the District’s Black and African American population.

Lend A Box’s Discriminatory Statements and Refusals of Service

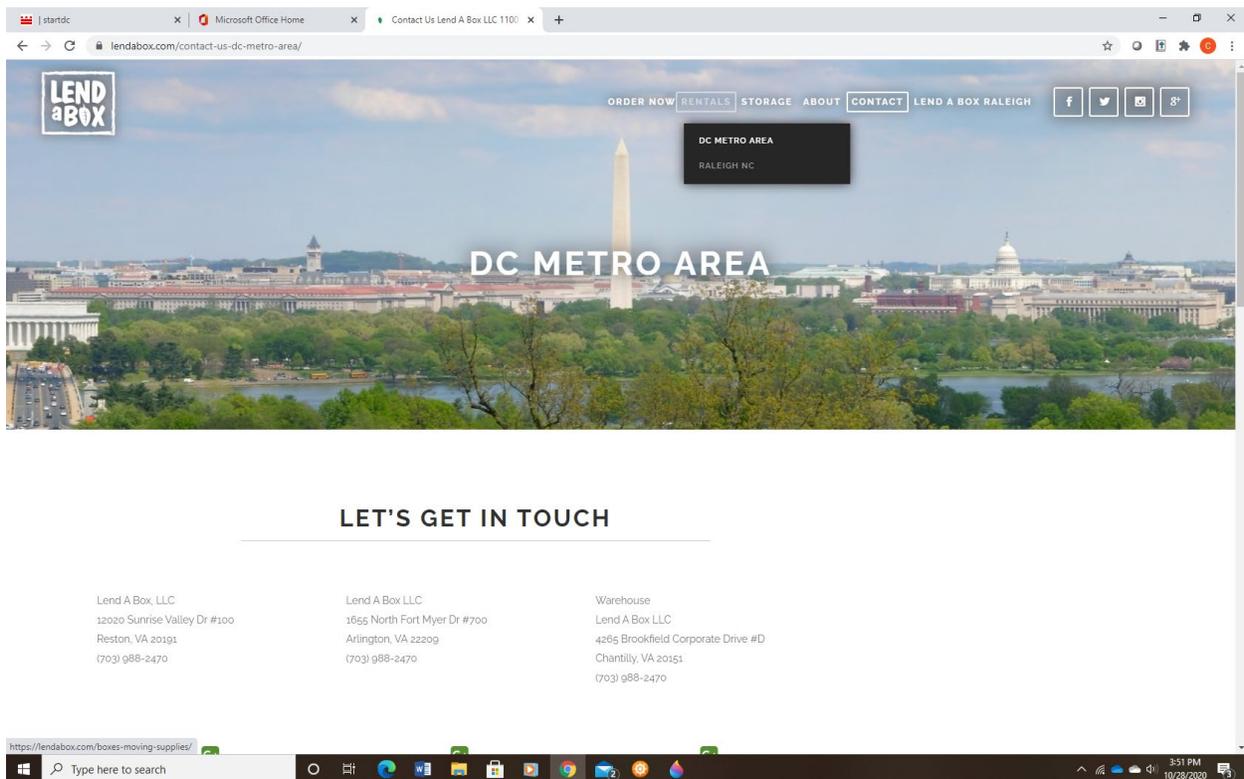
22. Lend A Box is a moving services and supplies company headquartered in Chantilly, Virginia. It has been in business for nearly ten years and serves the District metro area and Raleigh, North Carolina with its four offices.

23. Lend A Box provides storage and moving services to residential, commercial and government customers. Its services range from providing moving boxes to coordinating and conducting large government moves.

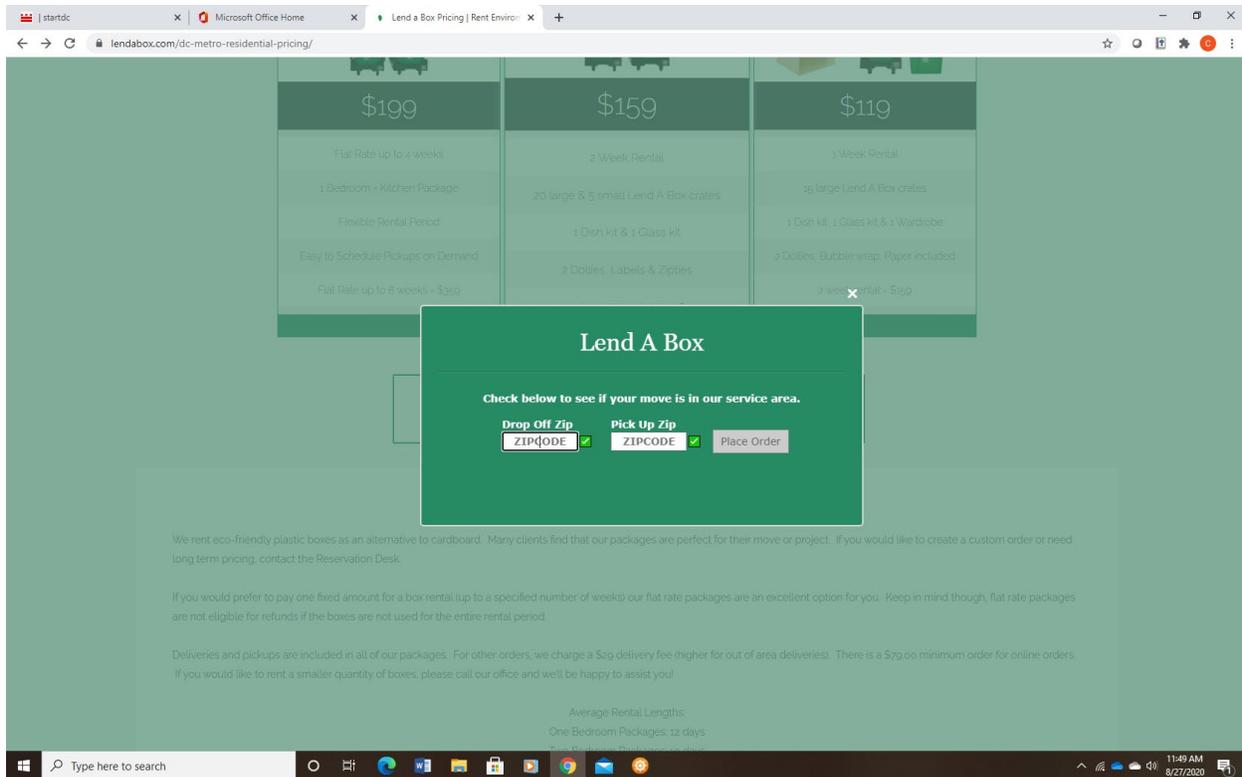
24. One of Lend A Box’s primary services is renting out reusable moving boxes. With this service, a customer can reserve the number of boxes he or she needs, and Lend A Box will deliver the boxes to the customer and retrieve the boxes from the customer’s new location once the move is completed. Using only Lend A Box’s

website www.lendabox.com, customers may reserve and calculate payment for rental boxes and schedule the boxes' delivery and retrieval.

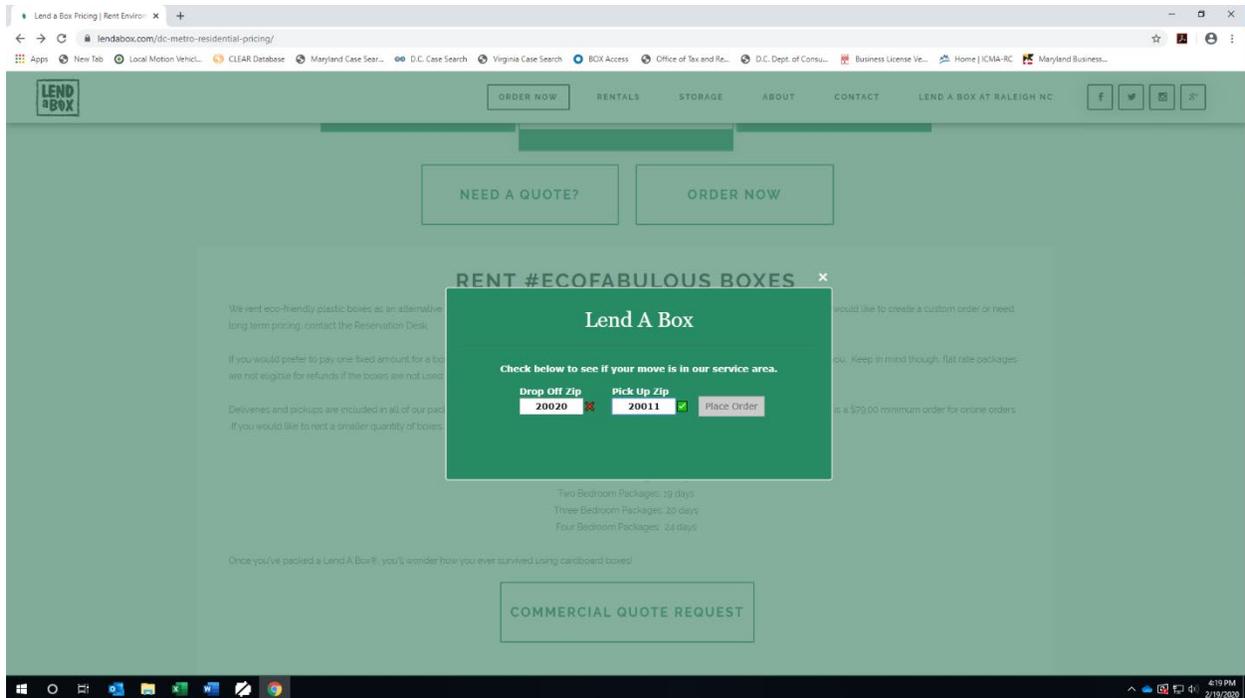
25. At multiple points on its website, Lend A Box asserts that it serves two areas: the "DC metro area" and "Raleigh NC." Lend A Box also includes images of the District, such as the Washington Monument, on its website. A screen shot showing such an image appears below:



26. Using Lend A Box's website to order moving boxes, potential customers first determine whether their move falls within Lend A Box's service area. To do so, a customer navigates to the "order now" tab and click on "order boxes," at which point a dialog box appears on screen prompting the user to enter in the "drop off zip" and "pick up zip." A screen shot of the rental order box appears below:

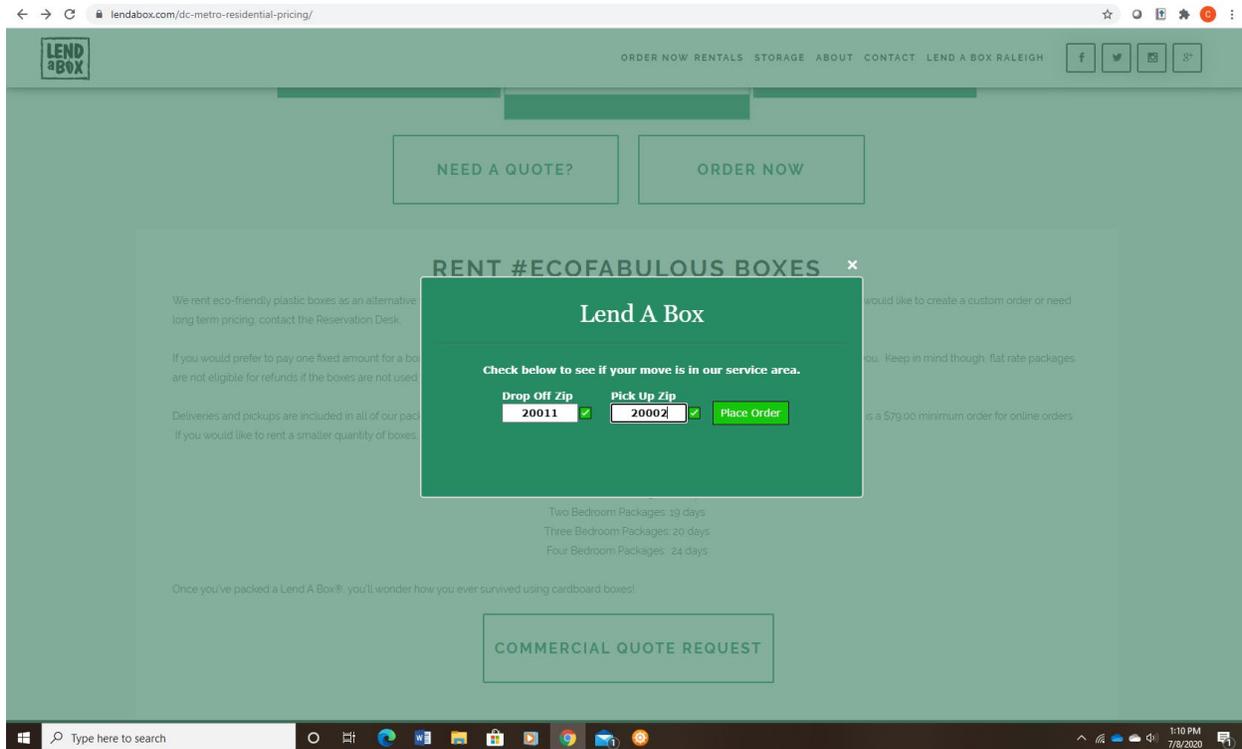


27. If a zip code falls within Lend A Box’s service area, a green check mark will appear next to the zip code. If a zip code falls outside of Lend A Box’s service area, a red “X” appears next to the zip code. A screen shot showing the green check mark and red “X” appears below:



28. If one or both of the “drop off zip” and “pick up zip” boxes include a zip code outside of Lend A Box’s service area, the “Place Order” button next to the zip code entry field cannot be selected, and the dialog box does not allow the user to order rental boxes, with no explanation for the exclusion of the zip code(s) from Lend A Box’s service area provided.

29. If both zip codes fall within Lend A Box’s service area and thereby auto-populate two green check marks, the “Place Order” button next to the zip code entry fields, which previously was gray, activates and becomes green. By clicking on the now-activated “Place Order” button and submitting order information, a customer may complete the rental box ordering process entirely online. A screenshot of the green “Place Order” button with two approved zip codes appears below:



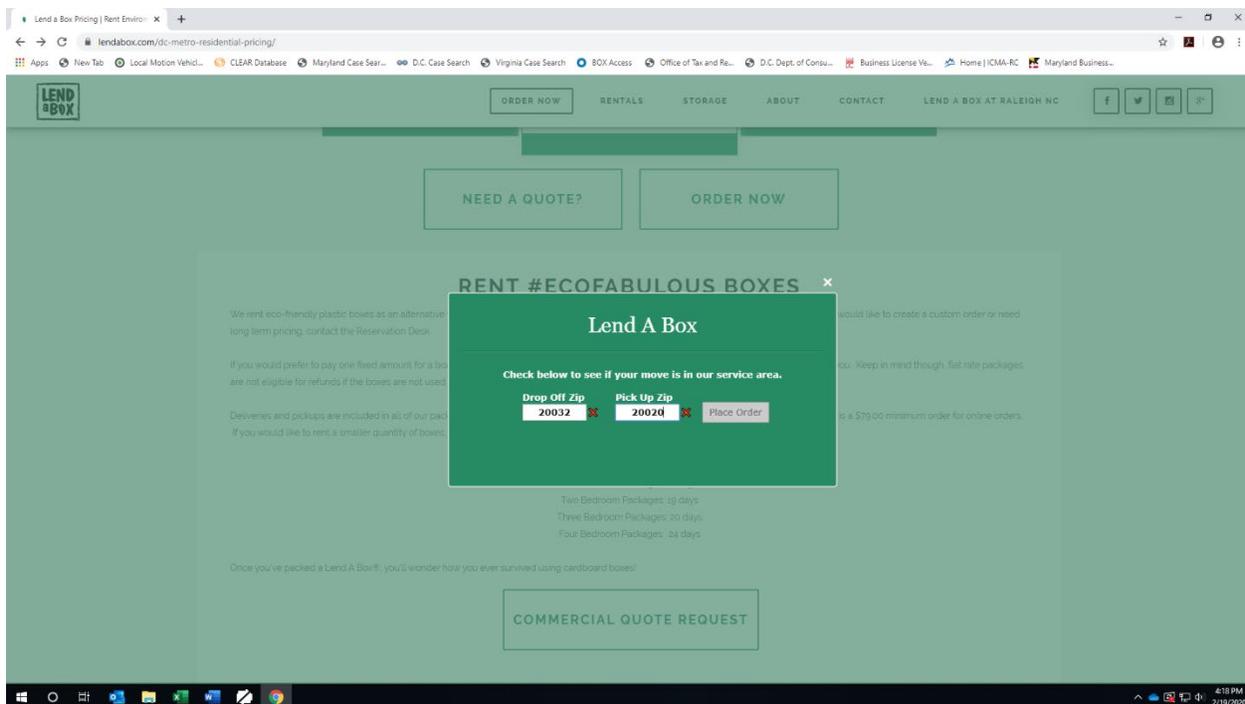
30. Lend A Box’s website uses Vonigo, a booking and route-mapping software, as its online booking software and to produce route maps for online rental box orders.

31. Vonigo’s software gives businesses wide berth in customizing the software to its needs. For example, Vonigo enables businesses to adjust Vonigo-produced route maps, to select which areas or neighborhoods to serve, and to designate online bookings as “pending.” In so doing, businesses using Vonigo may change Vonigo-produced service routes after an online booking has been received, may elect to serve only certain areas or neighborhoods, may adjust Vonigo-produced routes to serve certain areas or neighborhoods only during particular times or on specific days and may review bookings and schedules before confirming. By giving

businesses the power to choose how to customize routes and schedules produced by its software, Vonigo leaves it to businesses to decide who to serve and when.

32. Lend A Box customized the Vonigo software to intentionally exclude zip codes 20020 and 20032 from its service area.

33. Beginning on or before February 13, 2020, Lend A Box's online rental order system indicated that Lend A Box would not serve addresses in zip codes 20020 and 20032, but would serve all other District zip codes, including zip codes that are farther from Lend A Box's offices. Neither 20020 nor 20032 residents could reserve rental boxes through Lend A Box's website, and Lend A Box's website did not direct residents of 20020 or 20032 to contact Lend A Box directly to reserve rental boxes. A screenshot showing these refusals for 20020 and 20032 appears below:



COUNTS I-II
DISCRIMINATORY REFUSALS OF SERVICE IN VIOLATION OF THE DCHRA

34. Paragraphs 1-33 are incorporated here.

35. Under the DCHRA, it is “an unlawful discriminatory practice to ... to deny, directly or indirectly, any person the full and equal enjoyment of the goods, services, facilities, privileges, and accommodations of any place of public accommodations” based on the person’s “actual or perceived ... place of residence or business.” D.C. Code § 2-1402.31(a)(1).

36. The DCHRA defines a “place of public accommodation” to include establishments dealing with goods or services of any kind.” D.C. Code § 2-1401.02(24); D.C. Bill 23-0409.

37. Lend A Box is a place of public accommodation under the DCHRA because it provides goods or services in the District.

38. Lend A Box refused to allow residents of 20020 and 20032 to reserve rental moving boxes based on the residents’ place of residence, while allowing residents of every other District zip code to reserve rental moving boxes. Lend A Box’s refusals of service violated § 2-1402.31(a)(1) of the DCHRA, because the refusals denied residents of District zip codes 20020 and 20032 the full and equal enjoyment of a place of public accommodation due to the person’s place of residence. D.C. Code § 2-1402.31(a)(1).

COUNTS III-IV
DISCRIMINATORY STATEMENTS IN VIOLATION OF THE DCHRA

39. Paragraphs 1-38 are incorporated here.

40. The DCHRA prohibits places of public accommodations from causing, directly or indirectly, a statement to be posted “indicat[ing] that the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation will be unlawfully refused, withheld from or denied an individual” based on the individual’s place of residence. D.C. Code § 2-1402.31(a)(2).

41. Lend A Box is responsible for the statements on its website that indicated that it would not serve District residents of zip codes 20020 and 20032. Using a system of red “Xs” and green checkmarks, with the “Xs” as signs that represent “no” and the green checkmarks representing “yes,” Lend A Box indicated that it would serve all District residents except residents of zip codes 20032 and 20020.

42. These red “Xs” and green checkmarks are statements that Lend A Box used to violate the DCHRA, which prohibits places of public accommodations from causing, directly or indirectly “to be published a statement, advertisement, or sign which indicates that the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation will be unlawfully refused, withheld from or denied an individual” based on the individual’s place of residence. D.C. Code § 2-1402.31(a)(2).

**COUNTS V-VI
DISPARATE IMPACTS BASED ON RACE IN VIOLATION OF THE DCHRA**

43. Paragraphs 1-42 are incorporated here.

44. The DCHRA's Effects Clause prohibits "[a]ny practice which has the effect or consequence of violating any of the provisions of [the DCHRA]" as an "unlawful discriminatory practice." D.C. Code § 2-1402.68. Therefore, a practice which has the effect or consequence of discriminating against District residents on the basis of the residents' race is a violation of the DCHRA's Effects Clause.

45. Defendant Lend A Box is responsible for the disparate negative impact on Black and African American District residents caused by Lend A Box's discriminatory refusals to serve residents of zip codes 20020 and 20032, almost 90% of whom are Black or African American, in violation of D.C. Code § 2-1402.68.

46. Defendant Lend A Box is responsible for the disparate negative impact on Black and African American District residents caused by Lend A Box's discriminatory statements on its website, which communicated that Lend A Box refused to serve residents of zip codes 20020 and 20032, almost 90% of whom are Black or African American, in violation of D.C. Code § 2-1402.68.

**COUNT VII
OPERATION OF A FOREIGN BUSINESS ENTITY
WITHOUT REGISTRATION IN THE DISTRICT**

47. Paragraphs 1-46 are incorporated here.

48. Defendant Lend A Box, LLC, a Virginia corporation, conducts businesses and provides services in the District but has not registered as a foreign business entity doing business in the District, as required under D.C. Code § 29-105.03. Lend A Box's failure to register as a foreign business entity doing business in the District violates D.C. Code § 29-105.02.

PRAYER FOR RELIEF

WHEREFORE, the District requests that this Court enter judgment in its favor and grant relief against defendant as follows:

- (a) Injunctive and declaratory relief;
- (b) Damages;
- (c) Penalties;
- (d) Fees;
- (e) The District's reasonable attorney's fees and costs; and
- (f) Such other and further relief as this Court deems appropriate based on

the facts and applicable law.

JURY DEMAND

The District of Columbia demands a jury trial by the maximum number of jurors permitted by law.

Dated: February 19, 2021.

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

TONI MICHELLE JACKSON
Deputy Attorney General
Public Interest Division

/s/ Michelle D. Thomas
MICHELLE D. THOMAS [993514]
Chief, Civil Rights Section
Public Interest Division

/s/ Samantha Hall
SAMANTHA HALL [1014735]
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Washington, D.C. 20001
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Attorneys for the District



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

_____ Plaintiff

vs.

Case Number _____

_____ Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

By _____
 Deputy Clerk

Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면, (202) 879-4828로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
 Veá al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____
 Subsecretario

Dirección _____

Fecha _____

Teléfono _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 반언어를 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

February 19, 2021

Date