

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DEBORAH THOMAS, JAMES KESKENY,  
JILL BABCOCK, MARTIN DROUILLARD,  
& EMMA DANIELS,

Plaintiffs,

Case No.

v.

NORTHWEST AIRLINES CORPORATION and  
WAYNE COUNTY AIRPORT AUTHORITY,

Defendants.

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**COMPLAINT**

Plaintiffs, Deborah Thomas, James Keskeny, Jill Babcock, Martin Drouillard, & Emma Daniels, state as follows:

**INTRODUCTION**

1. Plaintiffs bring this action to put an end to Defendants Northwest Airlines Corporation (Northwest) and the Wayne County Airport Authority's (Airport Authority) failure to comply with the Air Carrier Access Act 49 U.S.C. 41705 ("ACAA"), Department of Transportation implementing rule 14 CFR Part 382 et seq., the Americans with Disabilities Act of 1990, 42 U.S.C. 12101 et seq. ("ADA"), and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).

2. The Defendants are discriminating against Plaintiffs and others similarly situated by denying them equal access to air travel and attendant facilities at Detroit Metro Airport, including but not limited to McNamara Terminal, Smith Terminal, and adjoining areas such as parking facilities. The discriminatory acts and omissions are violations of the above-referenced statutes and include, but are not limited to, the following:

- a. Northwest and the Airport Authority force individuals with disabilities, who cannot walk or stand for excessively prolonged periods of time, to wait in lines that said individuals can not physically tolerate.
- b. Northwest Airlines and the Airport Authority fail to provide boarding assistance on aircrafts in violation of the above-referenced statutes and guidelines, and/or routinely engage in providing improper assistance, resulting in risk of injury to person and property, as well as great embarrassment and mortification for plaintiffs.
- c. Northwest Airlines and the Airport Authority fail to consistently hold open and to reserve bulkhead and other seats appropriate for chair users and other disabled passengers, where defendants should ensure that said seats are provided to passengers who are wheelchair users or are otherwise mobility-impaired.
- d. Defendants routinely fail to provide for cabin stowage of electric and other wheelchairs. Further, when storing wheelchairs in the baggage storage area, priority storage and handling is not provided. In fact, wheelchairs are often lost or rendered unusable due to damage sustained in handling.

- e. Defendants routinely fail to provide fully accessible lavatories in violation of the above-referenced statutes.
  - f. Defendants have ineffectively transferred disabled passengers, resulting in passengers being dropped to the floor.
  - g. Defendants fail to provide adequate assessable van service in transporting passengers from parking areas to the terminal
  - h. Defendants fail to provide counters set at a proper height so as to accommodate passengers who utilize wheelchairs.
  - i. Defendants fail to provide an area for seeing eye dogs and other service animals to relieve themselves
  - j. Defendants fail to provide ticket kiosks and in-flight entertainment devices which are usable to the blind and others who are impaired.
  - k. Plaintiffs are made to pay higher booking and reservation fees due to their inability to access the internet for transactions.
3. By ignoring the needs and dignity of disabled passengers, and denying equal access to airport facilities and planes for Plaintiffs, and others with disabilities, the Defendants treat them as second-class citizens, and unjustly disregard their basic rights to equality and dignity, and cause embarrassment, humiliation, harassment and emotional distress. Therefore, Plaintiffs seeks injunctive relief and declaratory relief to redress Defendant's past and continuing violation of their rights under federal law.

## JURISDICTION AND VENUE

4. This Court has jurisdiction over this action pursuant to 28 U.S.C. 1331, because Plaintiff's claims arise under federal statutes, the ADA, ACAA, and Section 504. In addition, this Court has jurisdiction over Plaintiff's claims for declaratory relief, pursuant to 28 U.S.C. 2201-02.
5. Venue is proper in the Eastern District of Michigan, Southern Division, because the Defendant Northwest Airlines conducts business within the district and Defendant Wayne County Airport Authority is situated within the district pursuant to 28 U.S.C. 1391, and because the events, acts, and omissions giving rise to Plaintiffs' claims occurred in this district.

## PARTIES

6. Plaintiff, Deborah Thomas, is an individual who is disabled due to childhood polio, living in Detroit, Michigan, who has flown Northwest airlines repeatedly from, Detroit Metro Airport for professional trips and family vacations, and wishes to exercise her right to travel without fear of injury and embarrassment and unnecessary frustration.
7. Plaintiff, Deborah Thomas, has incurred specific acts of discrimination in violation of the ACAA , ADA and Section 504 of the Rehabilitation Act which include, but are not limited to the following:
  - a. Being forced to stand in line for excessive periods of time, when physically unable to stand due to polio.

- b. Being separated from family members while being transported to the gate of the departing plane.
8. Plaintiff, Emma Daniels, is a legally blind individual, living in Detroit, Michigan, who has flown Northwest Airlines from Detroit Metro Airport to visit relatives, and wishes to have the right to travel without fear of injury, embarrassment, and unnecessary frustration.
9. Plaintiff, Emma Daniels, has incurred specific acts of discrimination in violation of the ACAA , ADA and Section 504 of the Rehabilitation Act which include, but are not limited to the following:
  - a. Being forced to stand in line for excessive periods of time, when physically unable to stand
  - b. Being denied use of check in kiosks due to her visual disability.
  - c. Being denied use of in-flight entertainment due to her visual disability.
  - d. Being physically separated from family members for purposes of transportation to and from the gate.
  - e. Being denied prompt service to the point of missing a flight while waiting to receive proper accommodation and assistance.
10. Plaintiff, Martin Drouillard, is an individual who uses a wheelchair due to quadriplegia, lives in Roseville, Michigan, who has flown Northwest Airlines from Detroit Metro Airport for vacations, and wishes to have the right to travel without fear of injury, embarrassment, and unnecessary frustration.

11. Plaintiff, Martin Drouillard, has incurred specific acts of discrimination in violation of the ACAA , ADA and Section 504 of the Rehabilitation Act which include, but are not limited to the following:
  - a. Physically dropping to the floor due to improper assistance in transferring to seat.
  - b. Being denied bulkhead seating despite requests for seating accommodation.
  - c. Wheelchair broken while in the handling of Northwest Airlines.
  - d. Delays in deplaning due to lack of assistance from Defendants.
  - e. Being denied accessible parking due to either a lack of accessible spaces and/or inadequate signage directing individuals to the accessible spaces.
12. Plaintiff, James Keskeny, an individual who uses a wheelchair due to multiple sclerosis, lives in Pinckney, Michigan, who has flown Northwest Airlines from Detroit Metro Airport for business and vacations, and wishes to have the right to travel without fear of injury, embarrassment, and unnecessary frustration.
13. Plaintiff, James Keskeny, has incurred specific acts of discrimination in violation of the ACAA , ADA and Section 504 of the Rehabilitation Act which include, but are not limited to the following:
  - a. Being physically transported in a degrading manner to seat by untrained airport personnel.
  - b. Being tilted parallel to the floor as wheeled downed the aisle of the plane by airport personnel.
  - c. Wheelchair broken while in the handling of Northwest Airlines.
  - d. Delays in deplaning due to lack of assistance from Defendants.



- e. Being made to board last when wishing earlier boarding.
  - f. Being denied a chair with a movable armrest.
14. Plaintiff, Jill Babcock, is an individual who utilizes a chair for transportation, living in Farmington, Michigan, who has flown Northwest airlines repeatedly from, Detroit Metro Airport for professional trips and family vacations, and wishes to exercise her right to travel without fear of injury and embarrassment and unnecessary frustration.
15. Plaintiff, Jill Babcock, has incurred specific acts of discrimination in violation of the ACAA, ADA and Section 504 of the Rehabilitation Act which include, but are not limited to the following:
- a. Being subjected to repeated damage to her wheelchair with every trip on Northwest Airlines. Said damage including brake damage, handle damage, caster damage, wheel damage and cup holder damage.
  - b. Being told that her chair was returned to another passenger with disabilities by mistake.
  - c. Being denied accessible parking due to either a lack of accessible spaces and/or inadequate signage directing individuals to the accessible spaces.
  - d. Being forced to ride from the parking area to the terminal in a non-accessible van due to lack of availability of one with a lift.
16. Plaintiffs have all suffered continued frustration and embarrassment in their interactions with Defendants.

17. Plaintiffs negative occurrences have been continual and repeating to the extent that Plaintiffs now have great trepidation when contemplating the possibility of flying and some have stopped flying as a result of the treatment they've experienced.
18. Plaintiffs have standing to bring the present cause of action:
  - a. Plaintiffs are physically disabled according to the definition provided by the ADA and ACAA, as they are either "substantially impaired in the major life activity of walking" or "legally blind".
  - b. Plaintiffs are being denied proper access and mobility when flying Northwest Airlines and utilizing Detroit Metro Airport, where they wish to travel to and from and/or otherwise conduct business, as such, they are being denied their rights as provided to them by the ADA and ACAA.
19. Northwest Airlines Corporation is a public corporation providing transportation within the meaning and definition of the ADA and ACAA.
20. Wayne County Airport Authority is a public, government entity within the meaning and definition of the ADA, as it was chartered by the Michigan Legislature in 2002.

#### **FACTUAL ALLEGATIONS**

21. Northwest Airlines operates over fifteen thousand flights a week worldwide, many originating from the McNamara terminal at Detroit Metro Airport.
22. The Wayne County Airport Authority is the government chartered entity that oversees Detroit Metro Airport.
23. Plaintiffs have all traveled repeatedly to and from Detroit Metro Airport via Northwest Airlines, and have routinely and repeatedly found Defendants to violate



their rights under the ACAA, ADA and Section 504 of the Rehabilitation Act as detailed above and below.

24. The Airport Authority, in conjunction with Northwest Airlines, after a series of conversations and meetings, voluntarily committed in 2006 to improving access for the disabled, agreeing amongst other things, to allow for an independent audit of the facilities and services provided at Detroit Metro Airport (Attachment A). This Agreement was aimed to resolve issues regarding the lack of accessibility for the disabled.
25. As of the filing of this Complaint, both Defendants continually fail to comply with their legal obligations to provide accessibility for disabled patrons and Plaintiffs are unaware of any audit to assess the gravity of the known violations.
26. These acts and omissions by Defendants violate clearly established federal law.
27. Upon information and belief other complaints have been filed concerning these accessibility problems with the Defendants.
28. Counsel for Plaintiffs participated in meetings held by and with the Defendants' agents, but no meaningful resolutions have been offered.
29. The denial of basic accessibility to Detroit Metro Airport and the flights operated by Northwest Airlines impedes Plaintiffs and others with disabilities from full and equal enjoyment of the rights of citizenship in a free society. In particular, this denial results in isolation, the perpetuation of social stigmas, loneliness, and social deprivation; it produces humiliation, frustration, and low self-image; limits professional, personal, family, recreational and educational opportunities by

restricting participation in travel, and imposes unnecessary irrational and unlawful obstacles to enjoying the benefits available to others without disabilities.

30. Defendants have seriously injured Plaintiffs and others similarly situated in other ways as well. Plaintiffs' injuries include, but are not limited to, emotional distress, time lost from professional, personal, family, recreational and educational trips, loss of social interaction, loss of camaraderie, and pain and suffering.
31. On information and belief, Plaintiffs alleges that the Defendants, through their policies, agents, and employees, have acted intentionally, willfully, in bad faith, and/or with reckless indifference for the federal legal rights of Plaintiffs and others with disabilities, in committing the acts and omissions stated here.
32. Defendants continues to discriminate against Plaintiffs and others based on their disabilities, by denying plaintiffs and others with equal access to Detroit Metro Airport and flights operated by Northwest Airlines, resulting in ongoing injury to plaintiffs and other disabled individuals.
33. Plaintiffs have no adequate remedy at law. While Plaintiffs reserves the right to seek monetary relief, they are not expressly doing so through this complaint. Plaintiffs seek equitable relief for Defendants' ongoing acts and omissions, as stated herein, and wishes for Detroit Metro Airport and flights operated by Northwest Airlines to be brought into compliance with the ACAA, ADA, and Section 504 of the Rehabilitation Act.
34. In short, Detroit Metro Airport and flights operated by Northwest Airlines are not accessible to the disabled, and as such, Defendants are in violation of the

aforementioned statutes and their own publicly pronounced commitment to inclusion.

**COUNT 1**

**VIOLATION OF THE AIR CARRIER ACCESS ACT, SPECIFICALLY 49 U.S.C. 41705 ET SEQ AND RELATED, AND U.S. DEPARTMENT OF TRANSPORTATION 14 CFR PART 382. ET SEQ AND RELATED**

35. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 34, inclusive.
36. In enacting the Air Carrier Access Act, Congress specifically prohibited discrimination by U.S. air carriers on the basis of physical or mental disability.
37. The Department of Transportation, in interpreting and implementing the ACAA, issued 14 CFR 382 et seq. in 1990 setting forth the standards of service which U.S. air carriers are expected to provide disabled individuals.
38. The Plaintiffs are composed of persons who constitute travelers who qualified individuals with a disability as defined by the ACAA and 14 CFR 382 et seq.
39. Defendant, Northwest Airlines, is an "air carrier" as defined by the ACAA and 14 CFR 382 et seq. Further, they are engaged in the business of providing air transportation.
40. Defendant, Wayne County Airport Authority, is an "air carrier" as defined by the ACAA and 14 CFR 382 et seq, as they engage in the business of air transportation. Further, they constitute an "air carrier airport" as defined by ACAA and 14 CFR 382 et seq, as Defendant Wayne County Airport Authority operates a commercial service airport (Detroit Metro) which enplanes annually 2,500 or more passengers and receives scheduled air service.

41. Defendant, Northwest Airlines has repeatedly violated the rights of Plaintiffs and others similarly situated by disregard of the Air Carrier Access Act 49 U.S.C. 41705 (“ACAA”), Department of Transportation implementing rule 14 CFR Part 382 et seq. Whether the abrogation of rights and respect for the disabled arise from willful action or incompetence are uncertain, but continual violations include but are not limited to:

- a. Failing to provide assistance requested by or on behalf of qualified individuals with a disability, in enplaning and deplaning, and/or providing inadequate assistance in violation of the ACAA and 14 CFR 382.39(a).
- b. Failing to provide on-board wheelchairs with adequate components to assist passengers in transferring and maneuvering in violation of ACAA and 14 CFR 382.21(a)(4)(iii)
- c. Failing to provide assistance in making flight connections and transportation between gates in violation of the ACAA and 14 CFR 382.39(a).
- d. Leaving passengers with disabilities unattended for periods of more than 30 minutes in a wheelchair when the passenger is not independently mobile in violation of the ACAA and 14 CFR 382.39(3)
- e. Failing to provide adequate boarding assistance in violation of ACAA and 14 CFR 382.40(a), et seq.
- f. Failing to allow for the stowage of canes, walkers, and other assistive devices on board the aircraft in close proximity to their seats ACAA and 14 CFR 382.41(c).
- g. Failing to allow for the on board stowage of passengers’ wheelchairs (including collapsible or break-down battery-powered wheelchairs in an onboard closet,

overhead compartment, or when applicable, under seats as provided by ACAA and 14 CFR 382.41(e), et seq.

- h. When stowing wheelchairs with other stowed baggage, failing to provide for the timely return of passenger wheelchairs and other assistive devices in violation of ACAA and 14 CFR 382.41(3)(f), et seq.
- i. Failing to reassemble wheelchairs and other assistive devices when they were disassembled by Defendant Northwest for transport, and/or failing to properly reassemble wheelchairs and other assistive devices without damaging said items in violation of ACAA and 14 CFR 382.43(a).
- j. Failing to establish administrative systems to ensure that individuals with mobility impairments can readily obtain seating in row with movable aisle armrests in violation of ACAA and 14 CFR 382.21(a)(1)(iii)
- k. Failing to provide information pertaining to the location of seats with movable armrests in violation of ACAA and 14 CFR 382.45 (a)(1).
- l. Failing to provide individual safety briefings to disabled passengers as indicated by ACAA and 14 CFR 382.45 (b)(1) et seq.
- m. Failing to ensure that disabled individuals have timely access to information the carrier provides to other passengers in the terminal or on the aircraft in violation of ACAA and 14 CFR 382.45(c).
- n. Restricting the movements of persons with a disability in terminals or holding areas or other locations in violation of ACAA and 14 CFR 382.55(c).
- o. Failing to provide adequate training for staff in violation of ACAA and 14 CFR 382.61 et seq.



- p. Failure to provide a bulkhead seat to a person with a fused or immobilized leg in violation of ACAA and 14 CFR 382.38(a)(4)
  - q. Failing to provide a complaints resolution official when presented with a complaint regarding accommodation, or the lack thereof, for disabled individuals in violation of ACAA and 14 CFR 382.65 et seq.
  - r. Failing to properly report all disability complaints received in violation of ACAA and 14 CFR 382.70 et seq.
  - s. Generally discriminating against disabled individuals in violation of ACAA and 14.CFR 382.7 et seq.
  - t. Other examples of Northwest Airlines failure to accommodate the disabled remain to be determined through the course of discovery.
42. Defendant, Wayne County Airport Authority, in partnership with Defendant Northwest, has repeatedly violated the rights of Plaintiffs and others similarly situated by disregard of the Air Carrier Access Act 49 U.S.C. 41705 ("ACAA"), Department of Transportation implementing rule 14 CFR Part 382 et seq. Whether the abrogation of rights and respect for the disabled arise from willful action or incompetence are uncertain, but continual violations include but are not limited to the following:
- a. Failing to provide assistance requested by or on behalf of qualified individuals with a disability, in enplaning and deplaning, and/or providing inadequate assistance in violation of the ACAA and 14 CFR 382.39(a).

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- b. Failing to ensure that the terminal facilities and services are readily accessible to and usable by individuals with disabilities in violation of ACAA and 14 CFR 382.23(b)
- c. Failing to ensure an accessible path between the gate and the area from which aircraft are boarded in violation of ACAA and 14 CFR 382.23(b)
- d. Failing to ensure that contracting companies abide by the laws and guidelines of the ACAA. And 14 CFR 382.9 et seq.
- e. Failing to provide assistance in making flight connections and transportation between gates in violation of the ACAA and 14 CFR 382.39(a).
- f. Failing to ensure that disabled individuals have timely access to information the carrier provides to other passengers in the terminal or on the aircraft in violation of ACAA and 14 CFR 382.45(c).
- g. Failing to ensure that disabled individuals have timely access to information the carrier provides to other passengers in the terminal or on the aircraft in violation of ACAA and 14 CFR 382.45(c).
- h. Restricting the movements of persons with a disability in terminals or holding areas or other locations in violation of ACAA and 14 CFR 382.55(c).
- i. Failing to provide adequate training for staff in violation of ACAA and 14 CFR 382.61 et seq.
- j. Failing to provide a complaints resolution official when presented with a complaint regarding accommodation, or the lack thereof, for disabled individuals in violation of ACAA and 14 CFR 382.65 et seq.

- k. Failing to properly report all disability complaints received in violation of ACAA and 14 CFR 382.70 et seq.
- l. Generally discriminating against disabled individuals in violation of ACAA and 14 CFR 382.7 et seq.
- m. Other examples of the Airport Authority's failure to accommodate the disabled remain to be determined through the course of discovery.

## COUNT II

### VIOLATION OF TITLE II AND TITLE III OF THE AMERICANS WITH DISABILITIES ACT.

- 43. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 42, inclusive;
- 44. In enacting the ADA, Congress expressly determined that society tends to isolate and segregate people with disabilities; that individuals with disabilities continually encounter prejudice and discrimination, including outright exclusion and the failure to eliminate exclusionary criteria; that this nation should assure equality of opportunity for all participation, independent living, and economic self-sufficiency to individuals with disabilities; and that continuing discrimination impedes them from competing on an equal basis and pursuing opportunities available to other citizens. 42. U.S.C. 12101(a).
- 45. The express purpose of the ADA is to provide a clear and comprehensive national mandate for eliminating discrimination against individuals with disabilities; to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities; and to ensure that the federal government plays

a central role in enforcing the standards established in the Act on behalf of individuals with disabilities 42 U.S.C. 12101 (b).

46. The Plaintiffs are persons who constitute “qualified individual(s) with a disability” under the ADA.
47. Defendant, Northwest Airlines, is a “private entity” as defined by the ADA and is engaged in the operation of a commercial facility (Detroit Metro)
48. Defendant, Northwest Airlines, is also engaged in the business of public transportation.
49. Defendant, Wayne County Airport Authority, to the extent that it is a government chartered entity, would be subject to Title II of the ADA.
50. Defendant, Wayne County Airport Authority, is engaged in the operation of a commercial facility.
51. Defendant, Wayne County Airport Authority, is also engaged in the business of public transportation.
52. Through the acts and omissions alleged here, Defendant has acted in disregard of Plaintiffs’ disabilities, excluded Plaintiffs and its members from access to travel and interstate commerce, and subjected them to discrimination, in violation of the ADA.
53. Defendants’ acts and omissions are in violation of the equal access and nondiscrimination requirements set forth in Title II and Title III of the ADA, and the regulations promulgated thereunder, and have resulted in injury to Plaintiffs and others similarly situated.
54. Defendants’ acts and omissions constitute an ongoing and continuous violation of Title II and Title III of the ADA. Unless restrained and enjoined from doing so,

Defendants will continue to violate this statute and to inflict irreparable injuries for which Plaintiffs has no adequate remedy at law.

55. The American's with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) is the identified architectural standard to be used in those portions of airport facilities not covered by the Air Carrier Access Act.
56. Defendants are in violation of the ADA and applicable ADAAG standards. Such violations include, but are not limited to the following:
  - a. Failure to provide adequate parking for the disabled in long term, short term, and off facility parking operated by Defendants.
  - b. Failure to provide adequate signage directing Plaintiffs and others similarly situated to the disabled parking that does exist.
  - c. Failing to clearly delineate non-obstructed routes to and from parking to check-in, and from check-in to gates and baggage claim areas.
  - d. Failure to provide Kiosks that are fully accessible to the disables, such as blind and vision impaired travelers.
  - e. Failing to allow for disabled passengers to easily acquire transportation of their choosing when departing from the airport.
  - f. Failing to provide adequate curb cuts and/or other ramps to facilitate ease of movement for chair users and others who are impaired.
57. The Defendants, Northwest Airlines and the Wayne County Airport Authority continue to denigrate their disabled patrons by avoiding their obligation to comply with the ADA. Intentionally delaying the implementation of disability accommodations and corrective measures such as a disability audit.

58. As stated above, Defendants have failed to comply with even the most minimal provisions of the Americans with Disabilities Act Architectural Guidelines, and is woefully in violation of their obligations to provide accommodation to travelers who are disabled.

**COUNT III**

**VIOLATION OF SECTION 504 OF THE REHABILITATION ACT OF 1973 (29 U.S.C. 794) ET SEQ AND RELATED.**

59. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 58, inclusive.
60. Section 504 states in part that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under" any program or activity that either receives Federal financial assistance or is conducted by any Executive agency.
61. Plaintiffs are qualified individuals with disabilities as defined by Section 504.
62. Upon information and belief, Defendant Wayne County Airport Authority receives federal financial assistance in its programs and activities and is an entity created by legislative enactment.
63. Upon information and belief, Defendant, Northwest Airlines, receives federal financial assistance in its programs and activities.
64. As referenced above, Defendants have consistently discriminated against Plaintiffs and other similarly situated individuals with disabilities.

WHEREFORE, plaintiff requests the relief set forth below.

**PRAYER FOR RELIEF**

Plaintiff prays for the following relief:

65. A declaration that Defendant Northwest Airlines and Defendant Wayne County Airport Authorities acts and omissions unlawfully violate plaintiffs' rights under the Air Carrier Access Act 49 U.S.C. 41705 ("ACAA"), Department of Transportation implementing rule 14 CFR Part 382 et seq. American's with Disabilities Act of 1990 (ADA), ADAAG guidelines, and the Federal Rehabilitation Act.
66. An injunction restraining the Defendants from receiving further federal licensing or funding unless and until it actually provides individuals with disabilities with full and equal access to Detroit Metro Airport and the flights operated by Northwest Airlines.
67. An injunction or other order instructing Defendants to actually provide individuals with disabilities with full and equal access to Detroit Metro Airport and the flights operated by Northwest Airlines, said order allowing Plaintiffs, or Plaintiff's representative to review all plans and/or construction drawings prior to their implementation.
68. A further injunction restraining the Defendants from discriminating against individuals with disabilities.
69. Although Plaintiffs seeks no compensatory damages at this time, Plaintiffs wish to reserve the right to amend and request compensatory damages should it become necessary to encourage the Defendants to comply with federal law.



70. Although Plaintiffs seeks no actual attorney's fees or costs, Plaintiffs wishes to reserve the right to amend and request attorney's fees and costs should it become necessary to encourage the Defendants to comply with federal law.
71. All other relief that this Court deems just and proper.

Respectfully submitted,

By: 

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