

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Nick Snyder and David Coyne, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

Washington Nationals Baseball Club LLC,

Defendant.

Case No. _____

**DEFENDANT WASHINGTON NATIONALS BASEBALL CLUB LLC'S NOTICE OF
REMOVAL**

Washington Nationals Baseball Club LLC (“Nationals” or “Defendant”), with full reservation of rights and defenses, gives notice of the removal of the above-captioned action from the Superior Court of the District of Columbia, in Washington, D.C. (Case No. 2024-CAB-001961), to the United States District Court for the District of Columbia, invoking this Court’s jurisdiction under the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1332(d). In support of removal, Defendant provides this short and plain statement of the grounds for removal. 28 U.S.C. § 1446(a).

I. Background

1. On March 28, 2024, Plaintiffs Nick Snyder and David Coyne (“Plaintiffs”) filed a putative class action complaint (“Compl.”) against Defendant in the Superior Court of the District of Columbia. *See* Ex. 1 (containing the packet of information served upon Defendant, including a copy of process, pleadings, and orders served).

2. Defendant was served with the Complaint on or after April 2, 2024.

3. Defendant has not served any answer or responsive pleadings to Plaintiffs' Complaint, nor made any appearance or argument before the Superior Court of the District of Columbia in this matter.

4. Plaintiffs bring this action under the District of Columbia Human Rights Act ("DCHRA"), D.C. Code §§ 2-1402.31(a)(1)-(2), and the District of Columbia Consumer Protection Procedures Act ("DC CPPA"), D.C. Code § 28-3904. *See* Compl. ¶¶ 57-94.

5. The gravamen of Plaintiffs' Complaint is that the Nationals allegedly offered discounted tickets and a spending credit to individuals aged 21 to 39, which Plaintiffs contend constituted age discrimination and an unlawful trade practice. *Id.*

6. Plaintiffs specifically allege that, during the 2023 season, the Nationals introduced a "Millennial Ticket Discount" program. Compl. ¶ 17. Plaintiffs allege that, under the Millennial Ticket Discount program, "fans between the ages of 21 and 39 received '30% off face value' of tickets purchased for *all* regular season home games and received a spending credit between \$5 and \$15 per ticket for concessions and merchandise." Compl. ¶ 18 (emphasis in original).

7. Plaintiffs allege that the Nationals offered the same discount and credit to individuals aged 21 to 39 at the outset of the 2024 season. Compl. ¶ 20.¹

8. Plaintiffs claim that the Nationals violated the DCHRA by (a) denying individuals aged 40 or older the opportunity to qualify for the Millennial Ticket Discount program and not providing an "equivalent discount" for such individuals; and (b) publishing statements about the Millennial Ticket Discount program. Compl. ¶¶ 19-20, 25, 57-78.

¹ Plaintiffs allege that the Millennial Ticket Discount program was renamed the "Young Professionals Ticket Discount" in 2024. Compl. ¶ 20. For the sake of simplicity, this Notice of Removal refers to the 2023 and 2024 programs as the "Millennial Ticket Discount" program throughout.

9. Plaintiffs also claim that the Nationals violated the DC CPPA by allegedly (a) violating the DCHRA “in the context of a consumer transaction,” Compl. ¶ 88, which they contend occurs when, *inter alia*, the Nationals “sell tickets to fans,” Compl. ¶ 84; (b) misrepresenting the definition of the term “Millennial” in website promotions for discounted tickets, Compl. ¶ 89²; and (c) representing that its ticket transactions would involve rights, remedies, or obligations that are prohibited by law, Compl. ¶ 90.

10. Plaintiffs bring this action as a proposed class action under Rule 23 of the D.C. Superior Court Rules of Civil Procedure. Compl. ¶ 47. Plaintiffs seek relief on their own behalf and on behalf of a putative class defined as follows:

All persons who (1) have purchased a ticket to a Washington Nationals home baseball game from the Washington Nationals for the 2023 season, the 2024 season, or a later season through judgment in this action, who did not receive a discount of 30% or greater off the price of that ticket or a spending credit between \$5 and \$15 for that ticket, and who were at least 40 years old when that ticket was purchased, or (2) who were at least 40 years old and did not purchase at least one ticket to a Washington Nationals home baseball game from the Washington Nationals for the 2023 season, the 2024 season, or a later season through judgment in this action due to the lack of a 30% discount or spending credits or the Washington Nationals’ statements regarding the Millennial or Young Professionals Ticket Discount.

Id.

11. For violations of the DCHRA, Plaintiffs seek damages for themselves and members of the proposed Class, including compensatory damages, civil penalties, and punitive damages, declaratory and injunctive relief, and attorneys’ fees and costs. Compl. ¶¶ 67-68, 77-78.

12. For violations of the DC CPPA, Plaintiffs seek monetary damages for themselves and members of the proposed Class, as well as the greater of treble damages or \$1,500 per violation, as well as punitive damages, injunctive relief, and attorneys’ fees and costs. Compl. ¶¶ 93-94.

² Specifically, Plaintiffs claim that a “Millennial” is someone born between 1981 and 1996. Compl. ¶ 35. They claim that because the Nationals defined the term “Millennial” using a different age bracket, that the Nationals have violated the DC CPPA. ¶¶ 36-39.

II. Parties.

13. According to the Complaint, Plaintiff Nick Snyder is a resident of Maryland. Compl. ¶ 7.

14. According to the Complaint, Plaintiff David Coyne is a resident of Maryland. Compl. ¶ 8.

15. According to the Complaint, the purported Class contains at least “tens of thousands of members” and there are “likely to be hundreds of thousands of members of the Class.” Compl. ¶ 48.

16. Defendant Washington Nationals Baseball Club LLC is a limited liability company organized under the laws of Washington, D.C. with its principal place of business in Washington, D.C.

III. Basis for Removal.

17. This Court has jurisdiction over this action under CAFA. CAFA gives federal district courts jurisdiction over “class actions” where (1) the plaintiff class numbers at least 100, (2) at least one plaintiff class member is diverse from any defendant, and (3) the aggregate amount in controversy exceeds \$5 million, exclusive of interest and costs. *Standard Fire Ins. Co. v. Knowles*, 568 U.S. 588, 592 (2013); 28 U.S.C. § 1332(d)(2).

18. As enumerated below, this matter is properly removable under CAFA.

19. **First**, the Complaint qualifies as a “class action” under CAFA.

20. Under CAFA, a “class action” includes any civil action filed under Fed. R. Civ. P. 23 or a “similar State statute or rule of judicial procedure authorizing an action to be brought by 1 or more representative persons as a class action.” 28 U.S.C. § 1332(d)(1)(B).

21. D.C. Rule 23 mirrors the language of Fed. R. Civ. P. 23. D.C. Rule 23 incorporates the same requirements of numerosity, commonality, typicality, and adequacy. *See* D.C. Rule 23(a). D.C. Rule 23 also incorporates the three types of class actions present in Fed. R. Civ. P. 23. *Compare* D.C. Rule 23(b) *with* Fed. R. Civ. P. 23(b).

22. Therefore, D.C. Rule 23 is a “similar State statute” under CAFA.

23. ***Second***, the Complaint satisfies CAFA’s numerosity requirement.

24. Plaintiffs allege that there are “at least tens of thousands of members of the Class and likely to be hundreds of thousands of members of the Class.” Compl. ¶ 48.

25. ***Third***, CAFA’s requirement of minimal diversity is also met.

26. Under CAFA, “an unincorporated association shall be deemed to be a citizen of the State where it has its principal place of business and the State under whose laws it is organized.” 28 U.S.C. § 1332(d)(10).

27. Defendant is, accordingly, a citizen of Washington, D.C.

28. Plaintiffs are both citizens of Maryland. Compl. ¶¶ 7-8.

29. Because diversity of citizenship exists between at least one plaintiff and at least one defendant, CAFA’s minimal diversity requirement is met. *See* 28 U.S.C. § 1332(d)(2)(A).

30. ***Fourth***, the Complaint satisfies CAFA’s amount in controversy requirement.

31. For jurisdiction to exist under CAFA, the matter in controversy must exceed the sum or value of \$5,000,000, exclusive of interest and costs. *See* 28 U.S.C. § 1332(d)(2). “In any class action, the claims of the individual class members shall be aggregated to determine whether the matter in controversy [meets the] \$5,000,000” threshold. 28 U.S.C. § 1332(d)(6).

32. “The general rule to assess whether the amount in controversy exceeds the threshold for federal . . . jurisdiction is that ‘the sum claimed by the plaintiff controls if the claim

is apparently made in good faith.” *Bronner on Behalf of Am. Stud. Ass'n v. Duggan*, 962 F.3d 596, 602 (D.C. Cir. 2020) (quoting *St. Paul Mercury Indem. Co. v. Red Cab Co.*, 303 U.S. 283, 288 (1938)).

33. The Nationals’ notice of removal need include only a plausible allegation that the amount in controversy exceeds the jurisdictional threshold. *See Dart Cherokee Basin Operating Co., LLC v. Owens*, 574 U.S. 81, 89 (2014).

34. While the Nationals dispute liability and damages in this case, “[s]uccess (or lack thereof) on the merits is not the linchpin of federal . . . jurisdiction.” *Bronner*, 962 F.3d at 606.

35. Here, Plaintiffs seek, among other things, \$1,500 in statutory damages for *each violation* of the DC CPPA. Compl. ¶ 93. Plaintiffs claim that a DC CPPA violation occurred, *inter alia*, with *each* 2023 or 2024 ticket purchase by an individual aged 40 or older who did not receive the Millennial Ticket Discount program discount or spending credit, *see* Compl. ¶¶ 25-26, 88. Thus, Plaintiffs are effectively asserting that the amount in controversy in this case is at least \$1,500 multiplied by the number of such ticket purchases. Plaintiffs allege that there are “at least tens of thousands of members of the Class and likely to be hundreds of thousands of members of the Class,” Compl. ¶ 48, which means the amount in controversy as alleged by Plaintiffs exceeds the \$5,000,000 threshold when multiplying the number of proposed Class members (at least 10,000 members) by the claimed statutory damages (\$1,500 per ticket purchase).

36. Furthermore, Plaintiffs demand other remedies under the DCHRA and DC CPPA, including: compensatory damages, civil penalties, punitive damages, declaratory and injunctive relief, and attorneys’ fees and costs. Compl. ¶¶ 67-68, 77-78, 93-94.

37. Indeed, Plaintiffs themselves state that their demand in this case is for thirty million dollars (\$30,000,000.00), as stated on the Civil Cover Sheet that they filed in the Superior Court of the District of Columbia. *See* Ex. 1, p. 27.

38. In short, although the Nationals dispute liability and damages in this case, the amount in controversy requirement for purposes of removal under CAFA is satisfied based on Plaintiffs' allegations.

IV. The Nationals Have Complied With All Procedural Requirements For Removal.

39. Plaintiffs served the Complaint on Defendant on or after April 2, 2024, which was less than 30 days ago.

40. This Notice of Removal is therefore timely pursuant to 8 U.S.C. § 1446(b) and Rule 6(a) of the Federal Rules of Civil Procedure.

41. Defendant is filing this Notice of Removal under 8 U.S.C. § 1446(b) and Rule 6(a) of the Federal Rules of Civil Procedure.

42. This Notice is signed pursuant to Fed. R. Civ. P. 11.

43. As required by 28 U.S.C. § 1446(a), copies of "all process, pleadings, and orders served upon such defendant or defendants in such action," are attached as Exs. 1.

44. The Civil Cover Sheet accompanying this Removal Notice is attached as Ex. 2.

45. A copy of Defendant's Notice and Acknowledgement of Service is attached as Ex. 3.

46. A copy of the docket for this matter (case No. 2024-CAB-001961) from the Superior Court of the District Columbia is attached as Ex. 4.

47. Contemporaneously with this filing, Defendant is also filing a Notice of Filing of Notice of Removal with the Clerk of the Superior Court of the District of Columbia, as required

by 28 U.S.C. § 1446(d). A true and correct copy of the Notice of Filing of Notice of Removal is attached as Ex. 5.

48. Defendant will promptly serve the written notice of removal on all adverse parties and will file a copy with the Clerk of the Superior Court of the District of Columbia. Defendant intends to do this promptly after filing this Notice of Removal in federal court.

49. Defendant reserves all rights. Nothing herein should be construed as a waiver or relinquishment of any of Defendant's rights, defenses, or remedies.

Dated: April 23, 2024

Respectfully submitted,

/s/ George Ingham

George Ingham (DC Bar No. 1007658)

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*Attorneys for Washington Nationals Baseball
Club LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April 2024 a copy of the foregoing was served on:

Peter Romer-Friedman
PETER ROMER-FRIEDMAN LAW PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
Telephone: (202) 355-6364
Peter@prf-law.com

Ryan Allen Hancock
WILLIG WILLIAMS DAVIDSON
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Telephone: (215) 656-3600
rhancock@wwdlaw.com

*Counsel for the Plaintiffs and the
Proposed Class*

/s/ George Ingham
George Ingham

Exhibit 1



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

Nick Snyder and David Coyne,

Plaintiff

vs.

Case Number 2024-CAB-001961

Washington Nationals Baseball Club LLC

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.

Peter Romer-Friedman

Name of Plaintiff's Attorney

1629 K Street NW, Suite 300, Washington, DC 20006

Address

202-355-6364

Telephone

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828로 전화주세요. ເຖິງແມ່ນວ່າ ຈົ່ງ ໂທ ໂທ (202) 879-4828 ເພື່ອ ຄຳ ຈື່ງ ຄຳ ຈື່ງ

Clerk of the Court

By

Deputy Clerk



Date

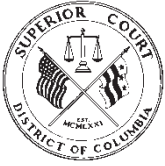
April 2, 2024

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

Vea 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

반영을 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 pedirayuda al respecto.

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

**IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

NICK SNYDER and DAVID COYNE,
on behalf of themselves and others
similarly situated,

Plaintiffs' Counsel's Address:
Peter Romer-Friedman Law PLLC
1629 K Street NW, Suite 300
Washington, DC 20006

Plaintiffs,

v.

WASHINGTON NATIONALS
BASEBALL CLUB LLC,

Defendant's Address:
Washington Nationals Baseball Club LLC
Attn: Legal Department
1500 S. Capitol Street SE
Washington, DC 20003

Defendant.

Case No. 2024 CA

**CLASS ACTION COMPLAINT AND
DEMAND FOR JURY TRIAL**

2024-CAB-001961

Plaintiffs Nick Snyder and David Coyne (“Plaintiffs”) respectfully submit this Class Action Complaint against the Washington Nationals Baseball Club, LLC (“Washington Nationals” or “Nationals”) for violating the D.C. Human Rights Act’s prohibition on age discrimination in places of public accommodations by denying persons 40 and older the opportunity to receive a 30% ticket discount for nearly all regular season games and a \$5 to \$15 per-ticket spending credit that the Washington Nationals have provided to 21- to 39-years-old fans through the team’s “Millennial Ticket Discount” in 2023 and “Young Professionals Ticket Discount” in 2024. The Plaintiffs also bring claims under the D.C. Consumer Protection Procedures Act for the same unlawful, discriminatory conduct and for making material misrepresentations to consumers.

INTRODUCTION

1. Every spring, millions of baseball fans congregate in stadiums across America to witness the return of our national pastime. For as long as there's been baseball in America, people of all backgrounds have played, watched, and fallen in love with the sport. And perhaps more than any other sport in America, baseball has been intergenerational and age-inclusive. Each generation of fans, players, coaches, and broadcasters has endowed the next generation with its formative memories of triumph and heartbreak—Jackie Robinson wearing a Brooklyn Dodgers uniform for the first time, Hank Aaron breaking Babe Ruth's home run record, Nolan Ryan throwing his seventh no-hitter at the age of 44, Cal Ripken playing his 2,131st consecutive game, Bill Buckner's error in Game 6 of the 1986 World Series, or Curt Flood being blacklisted for seeking free agency.

2. In light of baseball's intergenerational history, it was surprising and disappointing that in 2023 the Washington Nationals decided to discriminate against fans who are 40 or older and make it harder for older fans to attend the Nationals' games relative to younger fans.

3. At the outset of the 2023 season, the Washington Nationals rolled out a "Millennial Ticket Discount" that offered a 30% discount on tickets and a \$5 to \$15 per-ticket spending credit for all regular season home games for fans who were 21 to 39 years old. At the same time, the Washington Nationals did not offer an equivalent discount for fans who were 40 or older. This year, during the 2024 season, the Washington Nationals are providing the same significant discount and spending credit for 21- to 39-year-olds. But the Washington Nationals have rebranded the deal as the "Young Professionals Ticket Discount". And just like last season, people 40 or older can't get the same discount or spending credit as 21- to 39-year-olds.

4. Because of the Washington Nationals' "Millennial" or "Young Professionals Ticket Discount," a 39-year-old who earns \$400,000 a year receives a 30% discount for the same exact seats for which a 55-year-old who earns \$50,000 a year must pay full price. That makes absolutely

no sense. But more importantly, this policy is blatantly unlawful discrimination that advances an illicit stereotype that older fans are less worthy or in need of a discount than younger fans.

5. The District of Columbia Human Rights Act (“DCHRA”) is one of our nation’s strongest civil rights laws. The DCHRA prohibits places of public accommodation like the Washington Nationals from discriminating against older customers based on their age. That means that the Washington Nationals cannot lawfully provide discounts for baseball tickets or ballpark spending credits to 21- to 39-year-olds without offering the same discount and credits to people who are 40 or older.

6. In this action, the Plaintiffs, two older baseball fans who live in the D.C. Metro area, challenge the Washington Nationals’ “Millennial” and “Young Professionals Ticket Discount” for 21- to 39-year-olds and seek to ensure that *all* fans, regardless of their age, have the same opportunity to participate in our national pastime in America’s capital.

PARTIES

7. Plaintiff Nick Snyder is a 40-year-old baseball fan who lives in Maryland. During the past 12 months, Mr. Snyder purchased a non-discounted ticket from the Washington Nationals to visit the Nationals’ Stadium in the District of Columbia during the 2024 season. Because of Mr. Snyder’s age, he was ineligible to qualify for the Young Professionals Ticket Discount when he purchased a ticket for the 2024 season. Mr. Snyder plans to visit the Washington Nationals’ Stadium during the 2024 season and in future seasons.

8. David Coyne is a 58-year-old baseball fan who lives in Maryland. During the past 12 months, Mr. Coyne purchased non-discounted tickets from the Washington Nationals to visit the Nationals’ Stadium in the District of Columbia during the 2023 season. Because of Mr. Coyne’s age, he was ineligible to qualify for the Millennial Ticket Discount during the 2023 season

or the Young Professionals Ticket Discount during the 2024 season. Mr. Coyne plans to visit the Washington Nationals' Stadium during the 2024 season and in future seasons.

9. The Washington Nationals Baseball Club, LLC ("Washington Nationals") is the owner of the Washington Nationals professional baseball franchise and the operator of the Nationals' Stadium (collectively, "Washington Nationals" or "Nationals"). The Nationals are located in the District of Columbia at 1500 S. Capitol Street SE, Washington, DC 20003. The Washington Nationals have been a successful club since professional baseball returned to the District of Columbia in 2005. In 2019, the Nationals defeated the Houston Astros in the World Series, with a dynamic group of veteran players like Ryan Zimmerman, Max Scherzer, Stephen Strasburg, Howie Kendrick, and Sean Doolittle, and young stars like Juan Soto and Trea Turner. The Washington Nationals' valuation is \$2 billion with annual revenue of around \$350 million.¹

JURISDICTION

10. This Court has subject-matter jurisdiction under D.C. Code § 11-921(a). Because the Plaintiffs claim to be aggrieved by the Washington Nationals' unlawful discriminatory practice during the past year, they may assert a cause of action under the D.C. Human Rights Act in this Court. *See* D.C. Code § 2-1403.16(a). And because the Plaintiffs are consumers who seek relief from the Washington Nationals' trade practice that violates a D.C. law, they may bring an action under the D.C. Consumer Protection Procedures Act in this Court. *See* D.C. Code § 28-3905(k)(1)-(2).

11. This Court has personal jurisdiction over the Washington Nationals under D.C. Code § 13-422, because the Washington Nationals have their principal place of business in the

¹ MLB Valuations, # 16 Washington Nationals (2023), <https://www.forbes.com/teams/washington-nationals/?sh=7ba0a52f4680>; *see also* Chelsea Janes, *Still without a buyer, Nats enter the winter meetings in a familiar spot*, Wash. Post (Dec. 3, 2023) (stating that the owners of Nationals were offered \$2 billion in 2022 to sell the team), <https://www.washingtonpost.com/sports/2023/12/03/nats-sale-update-winter-meetings/>.

District of Columbia and are organized under the laws of the District of Columbia. The Court also has personal jurisdiction under D.C. Code § 13-423(a), because the Washington Nationals transact business in the District of Columbia and the claims at issue in this case arise from sales to consumers that took place in the District of Columbia.

FACTUAL ALLEGATIONS

The D.C. Human Rights Act makes it unlawful for places of public accommodation to discriminate against persons based on their age and other protected traits.

12. The District of Columbia Human Rights Act is one of the most protective civil rights laws in the nation. The DCHRA proclaims that:

Every individual shall have an equal opportunity to participate fully in the economic, cultural and intellectual life of the District and to have an equal opportunity to participate in all aspects of life, including, but not limited to, in employment, in places of public accommodation, resort or amusement, in educational institutions, in public service, and in housing and commercial space accommodations.

13. In particular, the D.C. Human Rights Act makes it unlawful for places of public accommodation to discriminate against persons based on their age, among other protected traits. D.C. Code § 2-1402.31(a).

14. The D.C. Human Rights Act prohibits places of public accommodation from engaging in two primary forms of age discrimination: (1) denying the full and equal enjoyment of any goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodations based on age; and (2) printing or posting a statement or advertisement that indicates that a person will be denied the full and equal enjoyment of such services or advantages of a place of public accommodations based on age. *See* D.C. Code § 2-1402.31(a)(1)-(2).

15. The D.C. Human Rights Act defines “place of public accommodation” broadly to mean “any person or place that provides, to a person in the District, access to an accommodation, service, or good,” including “any place where food is sold for consumption on the premises,” “any

store, park or enclosure where spirituous or malt liquors are sold,” “all stores where ice cream . . . or where beverages of any kind are retailed for consumption on the premises,” and “establishments dealing with goods or services of any kind”. D.C. Code § 2-1401.02(24). Thus, professional sports teams like the Washington Nationals that sell tickets, food, drinks, or merchandise to persons in the District of Columbia, and their stadiums, are places of public accommodations within the meaning of the D.C. Human Rights Act.

The Washington Nationals offer a 30% discount and spending credit for 21- to 39-year-olds, but offer no equivalent discount for people 40 or older.

16. For many years, the Washington Nationals have provided significant discounts to different types of fans based on their statuses or activities that are *not* tied to fans’ ages, such as discounts for servicemembers, first responders, and certain government employees.

17. During the 2023 season, the Washington Nationals introduced a “Millennial Ticket Discount” that offered a 30% discount and \$5 to \$15 spending credit to 21- to 39-years-old fans.

18. Under this “Millennial Ticket Discount,” fans between the ages of 21 and 39 received “30% off face value” of tickets purchased for *all* regular season home games and received a spending credit between \$5 and \$15 per ticket for concessions and merchandise.

19. During the 2023 season, however, the Washington Nationals did not provide an equivalent discount or spending credit to fans who were 40 or older or fans who were seniors.

20. At the outset of the 2024 season, the Washington Nationals changed the name of the “Millennial Ticket Discount” to the “Young Professionals Ticket Discount,” but have continued to provide the same 30% discount and merchandise credit between \$5 and \$15 per ticket to fans who are 21 to 39 years old for all regular season games except the home opener. And during the 2024 season, the Nationals have not offered an equivalent discount to fans who are 40 or older or fans who are seniors.

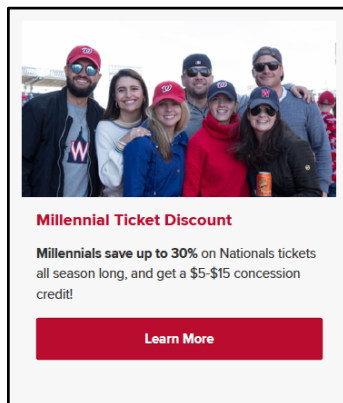
21. Persons who were 40 or older could not qualify for the Millennial Ticket Discount in 2023 *solely* because of their age. And persons who are 40 or older cannot qualify for the Young Professionals Ticket Discount in 2024 *solely* because of their age.

When marketing the “Millennial” or “Young Professionals Ticket Discount” the Nationals indicated that younger fans will receive better treatment than older fans and that older people will be denied full and equal enjoyment of the Nationals’ services, advantages, and accommodations.

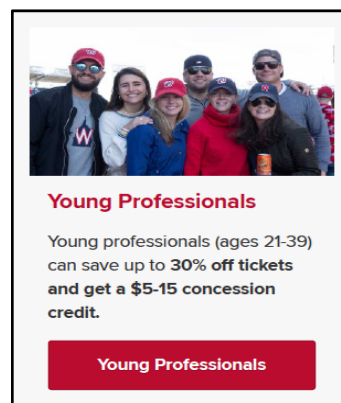
22. To encourage 21- to 39-year-olds to utilize the “Millennial” or “Young Professionals Ticket Discount,” the Washington Nationals have prominently marketed this discount through the team’s website.

23. In 2023, the Washington Nationals’ primary website for “Ticket Deals” prominently displayed the “Millennial Ticket Discount” and described how **“Millennials save up to 30% on Nationals tickets all season long, and get a \$5-\$15 concession credit!”** (emphasis in original). In 2024, the same Washington Nationals’ “Ticket Deals” website has displayed the “Young Professionals Ticket Discount” and described how “Young professionals (ages 21-39) can save up to **30% off tickets and get a \$5-15 concession credit.**” (emphasis in original). The relevant portion of the “Ticket Deals” website in 2023 and 2024 looked like the following:

2023




2024



24. During the 2023 and 2024 seasons, the Washington Nationals hosted a website exclusively to market the Millennial Ticket Discount and the Young Professionals Ticket Discount. During both seasons, this website included the same picture of younger fans at the Nationals' Stadium and included a statement "Calling all millennials" or "Calling all young professionals! (ages 21 to 39)" to utilize the 30% Millennial Ticket Discount or Young Professionals Ticket Discount. The relevant portion of the website looks like this:

2023

Millennial Ticket Discounts




Calling all millennials! The Nationals have a special offer to help you save on tickets all season long!

- Save up to 30% off face value
- Offer available for all regular season home games
- Tickets start at just \$23
- Spending credit for concessions & merchandise included with each ticket (\$5 to \$15)

2024

Young Professionals Ticket Discounts



Calling all young professionals! (ages 21 to 39) The Nationals have a special offer to help you save on tickets all season long!

- Save up to 30% off face value
- Tickets start at just \$25
- Spending credit for concessions & merchandise included with each ticket (\$5 to \$15)

By offering a 30% discount and a spending credit to 21- to 39-year-olds, but not to people 40 or older, and by publicizing that younger people will receive preferential treatment, the Washington Nationals violated the D.C. Human Rights Act.

25. By offering the Millennial or Young Professionals Ticket Discount to people 21 to 39 years old, but not providing an equivalent discount to people 40 or older, the Washington Nationals have denied the “full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of” the Nationals’ place of public accommodation in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(1).

26. The Washington Nationals’ Millennial or Young Professionals Ticket Discount expressly denies to people 40 or older two types “goods, services, facilities, privileges, advantages, and accommodations of” the Nationals’ place of public accommodation expressly because of their age. *First*, it provides significantly lower ticket prices to people 21 to 39 than to people 40 or older for the exact same Washington Nationals’ tickets and gives 21- to 39-year-olds a 30% discount on tickets that people 40 or older do not receive because of their age. *Second*, it provides a spending credit for concessions and merchandize of \$5 to \$15 per ticket for people 21 to 39 years old, but this same credit is not provided to people 40 or older because of their age.

27. Tickets to Washington Nationals’ games are services, facilities, privileges, advantages, and accommodations of the Nationals’ place of public accommodation. Likewise, the price of tickets and discount on tickets to Washington Nationals’ games are privileges or advantages of the Nationals’ place of public accommodation. A spending credit for concessions like food or drinks or for merchandise like shirts or hats is a good, service, facility, privilege, advantage, and accommodation of the Nationals’ place of public accommodation.

28. Furthermore, by publishing statements on the Washington Nationals’ website about providing a 30% discount and a spending credit to people who are Millennials, Young Professionals, or 21 to 39 years old, and calling on such younger people to use the 30% discount

and spending credit, without concurrently stating that people 40 or older can receive a 30% discount or a spending credit based on their age or their age of 40 or over, the Washington Nationals expressly stated and indicated that younger people, ages 21 to 39, will receive discounts and spending credits that the Nationals do not provide to people 40 or older, and expressly stated and indicated that people 40 or older will be refused, withheld from, or denied “the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations” of the Nationals’ place of public accommodation in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(2).

29. An ordinary reader who sees or reads the Washington Nationals’ statements about its Millennial or Young Professionals Ticket Discount would believe that people who are Millennials, Young Professionals, or 21 to 39 years old *will* receive and *do* receive preferential treatment over people who are 40 or older with respect to the price of tickets to the Nationals’ Stadium and spending credits and that people 40 or older will therefore be denied the “the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations” of the Nationals’ place of public accommodation.

By violating the D.C. Human Rights Act in the context of a consumer transaction, the Washington Nationals have also violated the D.C. Consumer Protection Procedures Act.

30. The District of Columbia Consumer Protection Procedures Act protects consumers from deceptive and unlawful trade practices by merchants that operate in the District of Columbia.

31. The D.C. Court of Appeals has interpreted the D.C. Consumer Protection Procedures Act to prohibit violations of any other District of Columbia statute in the context of a consumer transaction. Accordingly, when a merchant like the Washington Nationals violates the D.C. Human Rights Act in the context of a consumer transaction, it necessarily violates the D.C. Consumer Protection Procedures Act. *See District of Columbia v. Evolve, LLC*, 2020 D.C. Super.

LEXIS 6, at *12 (D.C. Super. Feb. 25, 2020) (agreeing with the position of the District of Columbia Attorney General).

32. Plaintiffs Snyder and Coyne and other fans who have purchased tickets from the Washington Nationals are “consumers” within the meaning of the D.C. Consumer Protection Procedures Act, because they purchase or receive consumer goods or services and otherwise provide the economic demand for a trade practice. D.C. Code § 28-3901(a)(2). The Washington Nationals is a “merchant” within the meaning of the D.C. Consumer Protection Procedures Act, because in the ordinary course of business it sells or transfers consumer goods or services to consumers. D.C. Code § 28-3901(a)(3). Accordingly, when the Washington Nationals sell tickets to fans and otherwise provide them with goods or services, the Washington Nationals and fans who purchase Nationals tickets engage in consumer transactions.

33. Because the Washington Nationals’ have violated the D.C. Human Right Act in the context of a consumer transaction through its Millennial Ticket Discount and Young Professionals Ticket Discount and related statements about the deal, the Washington Nationals have also violated the D.C. Consumer Protection Procedures Act.

By stating that “Millennials” will get a 30% discount but refusing to give that discount to Millennials who are 40 or older, the Nationals made material misrepresentations that violate the D.C. Consumer Protection Procedures Act.

34. The D.C. Consumer Protection Procedures Act prohibits merchants from misrepresenting a material fact that has a tendency to mislead or to represent that a transaction confers or involves rights, remedies, or obligations that it does not have or involve. D.C. Code § 28-3904(e), (e-1).

35. “Millennials typically are defined as being born between 1981 and 1996.” Mike Schneider, *Sorry, boomers: millennials and younger are new US majority*, AP (Aug. 3, 2020), <https://apnews.com/article/seniors-baby-boomers-millennials-featured-u-s-news->

[757359e85c4d9f555469848b21df3ab4](#). Therefore, in 2023 a person who was born in 1981 would be 42, a person born in 1982 would be 41, and a person born in 1983 would be 40.

36. Although in 2023 the Washington Nationals marketed the “Millennial Ticket Discount” as a 30% discount and spending credit that was available to Millennials, the Washington Nationals did not actually provide that discount or credit to *all* Millennials. Instead, the Washington Nationals only offered that discount and spending credit to Millennials who were 21 to 39 years old and did not offer it to Millennials who were 40, 41, or 42 years old.

37. As described above, the Washington Nationals’ website for “Ticket Deals” stated that “Millennials save up to 30% on Nationals tickets all season long, and get a \$5-15 concession credit!” And its website for the Millennial Ticket Discount stated, “Calling *all* millennials! The Nationals have a special offer to help *you* save on tickets all season long!” (emphasis added).

38. But in 2023, people who were 40, 41, and 42 years old *were Millennials*, but none of those Millennials could receive the Washington Nationals’ “Millennial Ticket Discount”. As such, the Washington Nationals’ misrepresented a material fact—that Millennials would receive the 30% ticket discount and a \$5 to \$15 per-ticket spending credit, and the Washington Nationals represented that its ticketing would confer rights on Millennials—the same discount and spending credit—that the transaction did not actually have or involve.

39. For example, during most of the 2023 season Plaintiff Snyder was 40 years old. And despite the fact that he is a Millennial, he could not receive the Millennial Ticket Discount.

Plaintiffs Snyder and Coyne have been denied equal treatment by the Washington Nationals and suffered both economic and stigmatic harm.

40. During the past 12 months, Plaintiffs Snyder and Coyne each purchased one or more non-discounted tickets from the Washington Nationals for a regular season game for which the Washington Nationals offered the same tickets at a 30% discount and with a \$5 to \$15 per-ticket spending credit for people 21 to 39 years old through the Millennial or Young Professionals Ticket Discount.

41. As a result, Plaintiffs Snyder and Coyne have each been denied the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of the Washington Nationals' place of public accommodation based on their age.

42. In addition, during the past 12 months Plaintiffs Snyder and Coyne have read the Washington Nationals' statements (described above) that expressly stated and indicated that the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of the Washington Nationals' place of public accommodation will be denied to people 40 or older because of their age.

43. If the Washington Nationals had offered people 40 or older the same 30% discount and \$5 to \$15 per-ticket spending credit that they gave people 21 to 39 years old during the past 12 months through the Millennial or Young Professionals Ticket Discount, Plaintiffs Snyder and Coyne would have obtained a 30% discount and spending credit when they purchased tickets from the Washington Nationals.

44. Because Plaintiffs Snyder and Coyne could not qualify for the "Millennial Ticket Discount," the "Young Professionals Ticket Discount," or another equivalent 30% discount or spending credit during the past 12 months, they paid significantly more for the same tickets as similarly situated 21- to 39-year-old fans who purchased tickets during the past 12 months and

utilized the Millennial or Young Professionals Ticket Discount. As such, Plaintiffs Snyder and Coyne have suffered economic harm from the Washington Nationals' discrimination against people 40 or older in a place of public accommodations.

45. In addition, Plaintiffs Snyder and Coyne suffered stigmatic harm from the Washington Nationals' classification and discrimination against them because of their age.

46. Plaintiffs Snyder and Coyne plan to purchase tickets from the Washington Nationals in the future.

CLASS ALLEGATIONS

47. The named Plaintiffs bring this action as a proposed action under Rule 23 of the D.C. Superior Court Rules of Civil Procedure on behalf of the following class:

All persons who (1) have purchased a ticket to a Washington Nationals home baseball game from the Washington Nationals for the 2023 season, the 2024 season, or a later season through judgment in this action, who did not receive a discount of 30% or greater off the price of that ticket or a spending credit between \$5 and \$15 for that ticket, and who were at least 40 years old when that ticket was purchased, or (2) who were at least 40 years old and did not purchase at least one ticket to a Washington Nationals home baseball game from the Washington Nationals for the 2023 season, the 2024 season, or a later season through judgment in this action due to the lack of a 30% discount or spending credits or the Washington Nationals' statements regarding the Millennial or Young Professionals Ticket Discount.

The proposed class satisfies the requirements of Rule 23(a).

48. The Class members are so numerous that joinder of all members is impracticable. There are at least tens of thousands of members of the Class and likely to be hundreds of thousands of members of the Class.

49. There are questions of law and fact common to the Class Members, including:

- A. Whether the Nationals provided a 30% ticket discount and spending credits of \$5 to \$15 per ticket to people who were 21 to 39 years old, but did not provide an equivalent discount or credit to people who were 40 or older;
- B. Whether the Millennial or Young Professionals Ticket Discount violated the D.C. Human Rights Act's prohibition on denying the full and equal enjoyment

of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation based on age;

- C. Whether the Millennial or Young Professionals Ticket Discount violated the D.C. Human Rights Act's prohibition on publishing statements that indicate that a place of public accommodation will deny the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation based on age;
- D. Whether the Washington Nationals' conduct violates the D.C. Consumer Protection Procedures Act;
- E. What injunctive and declaratory relief are warranted regarding the Washington Nationals' conduct;
- F. What types of damages are warranted; and
- G. What attorneys' fees and costs are warranted.

50. The named Plaintiffs' claims are typical of the claims of the Class they seek to represent, because they are people 40 or older who were denied discounts that were provided by the Washington Nationals to people 21 to 39 years old based on their age, because the Plaintiffs' claims arise from the same pattern or practice of conduct that forms the basis of the Class Members' claims, and because they bring the same legal claims as the Class Members based on the same legal theory.

51. There is no antagonism between the interests of the Plaintiffs and those of the Class Members, and the Plaintiffs will fairly and adequately represent the Class. There is no conflict between the Plaintiffs' claims and those of the Class Members. The Plaintiffs have retained counsel skilled in complex civil rights and consumer class actions who will vigorously prosecute this litigation.

Rule 23(b)(3) certification is appropriate.

52. Class certification is appropriate for the proposed Class under Rule 23(b)(3). The common questions of fact and law identified above predominate over any questions affecting only individual Class Members, including whether the Nationals' Millennial or Young Professionals Ticket Discount and related statements violated the D.C. Human Rights Act and the D.C. Consumer Protection Procedures Act.

53. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy. First, the Class Members do not have an interest in individually controlling the prosecution of separate actions, because their individual damages are unlikely to be large enough to warrant pursuing individual litigation in court or to obtain counsel to pursue an individual action, and because the cost of litigating the action will far exceed any potential benefit for individual Class Members. The prosecution of separate actions by individual Class Members would also impose heavy burdens upon the courts and would create a risk of inconsistent or varying adjudications of the questions of law and fact common to the proposed Classes, including the key legal questions of whether the Nationals' Millennial or Young Professionals Ticket Discount and related statements violate the D.C. Human Rights Act and the D.C. Consumer Protection Procedures Act.

54. A class action, on the other hand, would achieve substantial economies of time, effort, and expense, and would assure the uniformity of decision with respect to persons similarly situated without sacrificing procedural fairness or bringing about other undesirable results.

55. In addition, to date there has not been any litigation by the Class Members regarding the practice challenged in this action.

56. Finally, there will be no difficulties in managing this case as a class action.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

D.C. Human Rights Act

D.C. Code § 2-1402.31(a)(1)

57. Plaintiffs incorporate by reference and reallege all previous paragraphs.

58. The Plaintiffs, on behalf of themselves and the proposed Class, bring this Count under the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(1) against the Washington Nationals.

59. The D.C. Human Rights Act provides that “It shall be an unlawful discriminatory practice to do any of the following acts, wholly or partially for a discriminatory reason based on the actual or perceived . . . age . . . [t]o deny, directly or indirectly, any person the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodations”. D.C. Code § 2-1402.31(a)(1).

60. The Washington Nationals and the Nationals’ Stadium are places of public accommodation within the meaning of the D.C. Human Rights Act, because they are a “person or place that provides, to a person in the District, access to an accommodation, service, or good”. D.C. Code § 2-1401.02(24). The Washington Nationals sell food, ice cream, beverages, beer, and liquor on the premises of the Nationals’ Stadium, as well as merchandise and other goods and a range of services, such as dining and entertainment.

61. Tickets to Washington Nationals’ games are services, facilities, privileges, advantages, and accommodations of the Nationals’ place of public accommodation. Likewise, a discount on tickets to Nationals’ games are privileges and advantages of the Nationals’ place of public accommodation. A spending credit for concessions (such as food and drinks) and merchandise (such as shirts and hats) is a good, service, facility, privilege, advantage, and accommodation of the Nationals’ place of public accommodation.

62. The Washington Nationals violated D.C. Code § 2-1402.31(a)(1) by denying people 40 and older the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of the Washington Nationals' place of public accommodations, when it provided people 21 to 39 years old a Millennial Ticket Discount in 2023 and a Young Professionals Ticket Discount in 2024, including a 30% discount on tickets and a spending credits of \$5 to \$15 per ticket, while not providing an equivalent discount or spending credits to people 40 and older like the Plaintiffs and other members of the proposed Class.

63. The Nationals' Millennial or Young Professionals Ticket Discount expressly denies to people 40 and older two types "goods, services, facilities, privileges, advantages, and accommodations of" the Nationals' place of public accommodation solely because of their age. *First*, it provides significantly lower ticket prices to people 21 to 39 than to people 40 or older for the same exact Nationals' tickets by giving people 21 to 39 years old a 30% discount on tickets that people 40 or older do not receive because of their age. *Second*, it provides a spending credit for concessions and merchandize of \$5 to \$15 per ticket *only* for people 21 to 39 years old, but this same credit is not provided to people 40 or older because of their age.

64. This age-based denial of goods, services, facilities, privileges, advantages, and accommodations to people who are 40 or older in a place of public accommodation violates the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(1), because it classifies older people based on their age, because it facially and intentionally discriminates against older people based on their age, and because it advances and acts upon a stereotype that people 40 or older have more income than people under 40 and are less worthy or in need of a discount.

65. The Plaintiffs have a private right of action under D.C. Code § 2-1403.16, because they claim they have been aggrieved by the Washington Nationals' unlawful discriminatory practices that violate D.C. Code § 2-1402.31(a)(1).

66. The Washington Nationals' denial of its goods, services, facilities, privileges, advantages, and accommodations to older people in its place of public accommodation has caused economic harm and stigmatic harm to the Plaintiffs and other members of the Class.

67. The Plaintiffs seek damages for themselves and members of the proposed Class, including compensatory damages, civil penalties, and punitive damages, as well as declaratory and injunctive relief to stop the Washington Nationals' ongoing violations.

68. The Plaintiffs seek attorneys' fees and costs related to this claim and lawsuit.

SECOND CAUSE OF ACTION
D.C. Human Rights Act
D.C. Code § 2-1402.31(a)(2)

69. Plaintiffs incorporate by reference and reallege all previous paragraphs.

70. The Plaintiffs, on behalf of themselves and the proposed Class, bring this Count under the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(2), against the Washington Nationals.

71. The D.C. Human Rights Act provides that "It shall be an unlawful discriminatory practice to do any of the following acts, wholly or partially for a discriminatory reason based on the actual or perceived . . . age . . . (2) To print, circulate, post, or mail, or otherwise cause, 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". D.C. Code § 2-1402.31(a)(2).

72. As described above, the Washington Nationals and the Nationals' Stadium are places of public accommodation within the meaning of the D.C. Human Rights Act.

73. The Washington Nationals have published statements and advertisements on their website regarding the Millennial Ticket Discount and the Young Professionals Ticket Discount

that expressly stated and indicated that the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of the Nationals' place of public accommodation will be unlawfully refused, withheld from, or denied to people 40 or older because of their age.

74. In particular, by publishing statements on the Nationals' website about providing a 30% discount and spending credits to people who are Millennials, Young Professionals, and/or 21 to 39 years old, and calling on such younger people to use the 30% discount, without concurrently stating that people 40 or older can receive a 30% discount or a spending credit based on their age or their generation, the Nationals expressly stated and indicated that younger people, ages 21 to 39, will receive discounts and spending credits that the Nationals do not provide to people 40 or older, and expressly stated or indicated that people 40 or older will be refused, withheld from, or denied "the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations" of the Nationals' place of public accommodation in violation of the D.C. Human Rights Act, D.C. Code § 2-1402.31(a)(1).

75. An ordinary reader who sees or reads the Washington Nationals' statements about the Millennial or Young Professionals Ticket Discount would believe that people who are Millennials, Young Professionals, and/or 21 to 39 years old will receive preferential treatment over people who are 40 or older with respect to the price of tickets to the Nationals' Stadium and spending credit and that people 40 or older will therefore be denied the "the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations" of the Nationals' place of public accommodation.

76. The Washington Nationals' statements and advertisements regarding the Millennial Ticket Discount and the Young Professionals Ticket Discount have caused stigmatic harm towards the Plaintiffs and other people 40 or older and discouraged some members of the proposed Class from purchasing tickets to the Nationals' Stadium.

77. The Plaintiffs seek damages for themselves and members of the proposed Class, including compensatory damages, civil penalties, and punitive damages, as well as declaratory and injunctive relief to stop the Washington Nationals' ongoing violations.

78. The Plaintiffs seek attorneys' fees and costs related to this claim and lawsuit.

THIRD CAUSE OF ACTION
D.C. Consumer Protection Procedures Act
D.C. Code §§ 28-3904

79. Plaintiffs incorporate by reference and reallege all previous paragraphs.

80. The Plaintiffs, on behalf of themselves and the proposed Class, bring this Count under the D.C. Consumer Protection Procedures Act, D.C. Code § 28-3904, against the Washington Nationals.

81. The Washington Nationals is a "person" within the meaning of D.C. Code § 28-3901(a)(1), is a "merchant" under D.C. Code § 28-3901(3), and provides "goods and services" within the meaning of D.C. Code § 28-3901(a)(7). The Washington Nationals is a "merchant" because in the ordinary course of business it sells or transfers consumer goods or services to consumers, including the services and goods it provides at the Nationals' Stadium *Id.* § 28-3901(a)(3).

82. The Plaintiffs are "persons" within the meaning of D.C. Code § 28-3901(1).

83. Plaintiffs Snyder and Coyne and the members of the proposed Class are "consumers" within the meaning of D.C. Code § 28-3901(2), because they purchased or received consumer goods or services from the Washington Nationals and otherwise provide the economic demand for the Washington Nationals' trade practice. *See* D.C. Code § 28-3901(a)(2).

84. When the Washington Nationals sell tickets to fans and otherwise provide them with goods and services at the Nationals' Stadium, the Nationals and its fans engage in consumer transactions.

85. D.C. Code § 28-3904 makes it an “unlawful trade practice” to, *inter alia*, “misrepresent as to a material fact which has a tendency to mislead,” *id.* § 28-3904(e), “[r]epresent that a transaction confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law,” *id.* § 28-3904(e-1), and to violate other District of Columbia laws, such as the D.C. Human Rights Act, in the context of a consumer transaction.

86. The D.C. Consumer Protection Procedures Act makes such conduct an unlawful trade practice “whether or not any consumer is in fact misled, deceived, or damaged thereby.” D.C. Code § 28-3904.

87. The Washington Nationals have violated the D.C. Consumer Protection Procedures Act in several ways.

88. First, as described above and in Counts I and II, the Washington Nationals have violated the D.C. Human Rights Act by denying people 40 or older the full and equal enjoyment of the Nationals’ goods, services, facilities, privileges, advantages, and accommodations in a place of public accommodation based on their age and by making statements that indicate that people 40 or older will be denied such services in a place of public accommodation because of their age. Because the Washington Nationals have violated the D.C. Human Rights Act in the context of a consumer transaction, the Washington Nationals have also violated the D.C. Consumer Protection Procedures Act.

89. Second, by representing that Millennials would receive the “Millennial Ticket Discount” but refusing to provide the discount to Millennials who were 40, 41, or 42 during the 2023 season—like Plaintiff Snyder, who was 40 during most of the 2023 season—the Washington Nationals misrepresented a material fact that has a tendency to mislead in violation of D.C. Code § 28-3904(e) and the Washington Nationals represented that its ticketing transactions confer or

involve rights that they do not have or involve in violation of D.C. Code § 28-3904(e-1).

90. Third, when describing the “Millennial” or “Young Professionals Ticket Discount,” the Washington Nationals represented that its ticket transactions would involve rights, remedies, or obligations that are *prohibited by law* in violation of D.C. Code § 28-3904(e-1), because the Washington Nationals stated that they would provide a discount and spending credit to 21- to 39-year-olds (but not to people 40 or older) that violates the D.C. Human Rights Act.

91. The D.C. Consumer Protection Procedures Act provides that “[a] consumer may bring an action seeking relief from the use of a trade practice in violation of a law of the District.” D.C. Code § 28-3905(k)(1)(A).

92. Plaintiffs Snyder and Coyne bring this claim on behalf of themselves and the proposed Class.

93. As a direct and proximate result of the Washington Nationals’ conduct and violations of the D.C. Consumer Protection Procedures Act, the Plaintiffs and the members of the Class have suffered injuries and monetary damages described herein, and they seek treble damages or \$1,500 per violation, whichever is greater, punitive damages, and an injunction against the use of the Washington Nationals’ unlawful trade practice.

94. The Plaintiffs seek attorneys’ fees and costs related to this claim and lawsuit.

JURY TRIAL DEMANDED

The Plaintiffs hereby demand a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against the Defendant, and in favor of Plaintiffs and the proposed Class, and grant the following relief:

- A. Declaring that Washington Nationals' conduct violates the D.C. Human Rights Act and the D.C. Consumer Protection Procedures Act;
- B. Enjoining the Washington Nationals' conduct found to be in violation of the D.C. Human Rights Act and the D.C. Consumer Protection Procedures Act;
- C. Awarding the Plaintiffs restitution, treble damages, or statutory damages in the amount of \$1,500 per violation of the D.C. Consumer Protection Procedures Act, whichever is greatest.
- D. Awarding Plaintiffs damages for the Washington Nationals' violations of the D.C. Human Rights Act and the D.C. Consumer Protection Procedures Act;
- E. Granting Plaintiffs their costs of prosecuting this action, including attorneys' fees, experts' fees and litigation costs together with interest; and
- F. Granting such other relief as this Court may deem just and proper.

March 28, 2024

Respectfully submitted,

/s/ Peter Romer-Friedman

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Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH INFORMATION SHEET

Nick Snyder and David Coyne
Plaintiff(s)

vs

Washington Nationals Baseball Club LLC
Defendant(s)

Case Number: 2024-CAB-001961

Date: 04/01/2024

☐ One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Peter Romer-Friedman		Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: Peter Romer-Friedman Law PLLC		
Telephone No.: (202) 355-6364	DC Bar No.: 993376	

TYPE OF CASE: ☐ Non-Jury

☒ 6 Person Jury

☐ 12 Person Jury

Demand: \$ 30,000,000.00

Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
CONTRACT <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Breach of Warranty <input type="checkbox"/> Condo/Homeowner Assn. Fees <input type="checkbox"/> Contract Enforcement <input type="checkbox"/> Negotiable Instrument	COLLECTION/INS. SUB <input type="checkbox"/> Debt Collection <input type="checkbox"/> Insurance Subrogation <input type="checkbox"/> Motion/Application for Judgment by Confession <input type="checkbox"/> Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Discrimination <input type="checkbox"/> Wage Claim <input type="checkbox"/> Whistle Blower <input type="checkbox"/> Wrongful Termination
REAL PROPERTY <input type="checkbox"/> Condo/Homeowner Assn. Foreclosure <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Drug Related Nuisance Abatement	<input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Interpleader	<input type="checkbox"/> Other <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance
<input type="checkbox"/> FRIENDLY SUIT <input type="checkbox"/> HOUSING CODE REGULATIONS <input type="checkbox"/> QUI TAM <input type="checkbox"/> STRUCTURED SETTLEMENTS		
ADMINISTRATIVE PROCEEDINGS <input type="checkbox"/> Administrative Search Warrant <input type="checkbox"/> App. for Entry of Jgt. Defaulted Compensation Benefits <input type="checkbox"/> Enter Administrative Order as Judgment <input type="checkbox"/> Libel of Information <input type="checkbox"/> Master Meter <input type="checkbox"/> Petition Other	<input type="checkbox"/> Release Mechanics Lien <input type="checkbox"/> Request for Subpoena MALPRACTICE <input type="checkbox"/> Medical – Other <input type="checkbox"/> Wrongful Death <input type="checkbox"/> APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT	AGENCY APPEAL <input type="checkbox"/> Dangerous Animal Determination <input type="checkbox"/> DCPS Residency Appeal <input type="checkbox"/> Merit Personnel Act (OEA) <input type="checkbox"/> Merit Personnel Act (OHR) <input type="checkbox"/> Other Agency Appeal

Information Sheet, Continued

CIVIL ASSET FORFEITURE <input type="checkbox"/> Currency <input type="checkbox"/> Other <input type="checkbox"/> Real Property <input type="checkbox"/> Vehicle NAME CHANGE/VITAL RECORD AMENDMENT <input type="checkbox"/> Birth Certificate Amendment <input type="checkbox"/> Death Certificate Amendment <input type="checkbox"/> Gender Amendment <input type="checkbox"/> Name Change	TORT <input type="checkbox"/> Abuse of Process <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Conversion <input type="checkbox"/> False Arrest/Malicious Prosecution <input type="checkbox"/> Libel/Slander/Defamation <input type="checkbox"/> Personal Injury <input type="checkbox"/> Toxic Mass <input type="checkbox"/> Wrongful Death (Non-Medical Malpractice)			
GENERAL CIVIL <input type="checkbox"/> Accounting <input type="checkbox"/> Deceit (Misrepresentation) <input type="checkbox"/> Fraud <input type="checkbox"/> Invasion of Privacy <input type="checkbox"/> Lead Paint <input type="checkbox"/> Legal Malpractice <input type="checkbox"/> Motion/Application Regarding Arbitration Award <input type="checkbox"/> Other - General Civil	<input type="checkbox"/> Product Liability <input type="checkbox"/> Request for Liquidation <input type="checkbox"/> Writ of Replevin <input type="checkbox"/> Wrongful Eviction CIVIL I/COMPLEX CIVIL <input type="checkbox"/> Asbestos MORTGAGE FORECLOSURE <input type="checkbox"/> Non-Residential <input type="checkbox"/> Residential	STATUTORY CLAIM <input type="checkbox"/> Anti – SLAPP <input type="checkbox"/> Consumer Protection Act <input type="checkbox"/> Exploitation of Vulnerable Adult <input type="checkbox"/> Freedom of Information Act (FOIA) <input checked="" type="checkbox"/> Other TAX SALE FORECLOSURE <input type="checkbox"/> Tax Sale Annual <input type="checkbox"/> Tax Sale Bid Off		
<table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> VEHICLE <input type="checkbox"/> Personal Injury <input type="checkbox"/> Property Damage </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> TRAFFIC ADJUDICATION APPEAL <input type="checkbox"/> REQUEST FOR FOREIGN JUDGMENT </td> </tr> </table>			VEHICLE <input type="checkbox"/> Personal Injury <input type="checkbox"/> Property Damage	<input type="checkbox"/> TRAFFIC ADJUDICATION APPEAL <input type="checkbox"/> REQUEST FOR FOREIGN JUDGMENT
VEHICLE <input type="checkbox"/> Personal Injury <input type="checkbox"/> Property Damage	<input type="checkbox"/> TRAFFIC ADJUDICATION APPEAL <input type="checkbox"/> REQUEST FOR FOREIGN JUDGMENT			

04/01/2024

 Filer/Attorney's Signature

 Date



Superior Court of the District of Columbia
Civil - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
(202) 879-1133 | www.dccourts.gov

Case Number: 2024-CAB-001961

Case Style: Nick Snyder et al. v. Washington Nationals Baseball Club LLC

INITIAL ORDER

Initial Hearing Date: Friday, 07/19/2024	Initial Hearing Time: 9:30 AM	Courtroom Location: Remote Courtroom 517
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Shana Frost Matini.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-I, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated below, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing whether the clients are agreeable to binding or non-binding arbitration. This order is the only notice that parties and counsel will receive concerning this hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance will be granted except upon motion for good cause shown.
- 6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Anita M. Josey-Herring

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dcccourts.webex.com/meet/ctb517

Meeting ID: 129 911 6415

- 2) When you are ready, click “Join Meeting”.
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by “##”

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk’s Office at (202) 879-1133.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። የቃል ወይም የጽሑፍ ትርጓሜ ለመጠየቅ እባክዎን በመዝገብዎ የተዘረዘረውን የጸሀፊ ቢሮ (ክለርክ'ስ ኦፊስ) ያናግሩ። ለተጨማሪ መረጃ <https://www.dccourts.gov/language-access> ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?


The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?

The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?

- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.



Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at www.dccourts.gov/services/represent-yourself by clicking on the link that says, "List of Legal Service Providers for Those Seeking an Attorney or Legal Advice".
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.).
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.



Special Tips for Video Hearings

[\(Click here for more information\)](#)



- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.



District of Columbia Courts



Tips for Using DC Courts Remote

The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are six remote access sites throughout the community which will operate: **Monday – Friday, 8:30 am – 4:00 pm.**

The remote site locations are:

Remote Site - 1

Balance and Restorative Justice Center
1215 South Capitol Street, SW
Washington, DC 20003

Remote Site - 2

Balance and Restorative Justice Center
1110 V Street, SE
Washington, DC 20020

Remote Site - 3

Balance and Restorative Justice Center
118 Q Street, NE
Washington, DC 20002



Remote Site - 4

Balance and Restorative Justice Center
920 Rhode Island Avenue, NE
Washington, DC 20018

Remote Site - 5

Reeves Center
2000 14th Street, NW, 2nd Floor
Community Room
Washington, DC 20009

Remote Site - 6

Reeves Center
2000 14th Street, NW, Suite 300N
Office of the Tenant Advocate
Washington, DC 20009
**** No walk-ins at this location ****

If you want to use a remote site location for your hearing, call **202-879-1900** or email DCCourtsRemoteSites@dcsc.gov **at least 24 hours before your hearing to reserve a remote access computer station.** If you require special accommodations such as an interpreter for your hearing, please call **202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements.**

You should bring the following items when you come to your scheduled site location

1. Your **case number** and any **hyperlinks** provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.

***Safety and security measures are in place at the remote sites.**

Contact information to schedule your remote access computer station:

Call: **202-879-1900**

Email: DCCourtsRemoteSites@dcsc.gov



Tribunales del Distrito de Columbia

Consejos para usar los sitios de audiencia remota de los Tribunales de DC



Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay seis sitios de acceso remoto que funcionarán de **lunes a viernes, de 8:30 am a 4:00 pm**.

Los centros de acceso remoto son:

Sitio Remoto - 1

Balance and Restorative Justice Center
1215 South Capitol Street, SW
Washington, DC 20003

Sitio Remoto - 2

Balance and Restorative Justice Center
1110 V Street, SE
Washington, DC 20020

Sitio Remoto - 3

Balance and Restorative Justice Center
118 Q Street, NE
Washington, DC 20002



Sitio Remoto - 4

Balance and Restorative Justice Center
920 Rhode Island Avenue, NE
Washington, DC 20018

Sitio Remoto - 5

Reeves Center
2000 14th Street, NW, 2nd Floor
Community Room
Washington, DC 20009

Sitio Remoto - 6

Reeves Center
2000 14th Street, NW, Suite 300N
Office of the Tenant Advocate
Washington, DC 20009
No se puede entrar sin cita previa

Si desea usar un sitio remoto para su audiencia, llame al **202-879-1900** o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov **al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto**. Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al **202-879-1900 al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios**.

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su **número de caso** y todos los **hipervínculos** que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.

*Los sitios de acceso remoto cuentan con medidas de seguridad y protección.

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: **202-879-1900**

Correo electrónico: DCCourtsRemoteSites@dcsc.gov

Exhibit 2

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS Nick Snyder and David Coyne (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>88888</u> (EXCEPT IN U.S. PLAINTIFF CASES)	DEFENDANTS Washington Nationals Baseball Club LLC COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>11001</u> (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>																								
(c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) Peter Romer-Friedman Peter Romer-Friedman Law PLLC 1629 K St. NW, Suite 300 Washington, D.C. 20006 Tel: 202-355-6364	ATTORNEYS (IF KNOWN) Michael DeLarco and George Ingham Hogan Lovells US LLP 555 13th St. NW Washington, D.C. 20004 Tel: 202-637-5600																								
II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY) <div style="display: flex; justify-content: space-between;"> <div style="width:48%;"> <input type="radio"/> 1 U.S. Government Plaintiff </div> <div style="width:48%;"> <input type="radio"/> 3 Federal Question (U.S. Government Not a Party) </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width:48%;"> <input type="radio"/> 2 U.S. Government Defendant </div> <div style="width:48%;"> <input checked="" type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III) </div> </div>	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY! <table style="width:100%; border: none;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input checked="" type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input checked="" type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input checked="" type="radio"/> 4	Citizen of Another State	<input checked="" type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
	PTF	DFT		PTF	DFT																				
Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input checked="" type="radio"/> 4																				
Citizen of Another State	<input checked="" type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5																				
Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<input type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input type="radio"/> B. Personal Injury/Malpractice <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 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <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)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
<input type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil			
<u>Real Property</u> <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 <u>Personal Property</u> <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	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <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"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <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 <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input checked="" type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <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"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
☐ 1 Original Proceeding
 ☒ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify)
 ☐ 6 Multi-district Litigation
 ☐ 7 Appeal to District Judge from Mag. Judge
 ☐ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 Court has jurisdiction pursuant to the Class Action Fairness Act. See 28 U.S.C. 1332, 1441 and notice of removal filing.

VII. REQUESTED IN COMPLAINT

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 30,000,000

JURY DEMAND:

Check YES only if demanded in complaint
 YES ☒ NO ☐

VIII. RELATED CASE(S) IF ANY

(See instruction)

YES ☐ NO ☒

If yes, please complete related case form

DATE: 04/23/2024

SIGNATURE OF ATTORNEY OF RECORD /s/ George Ingham

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

Exhibit 3

**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

Nick Snyder and David Coyne*Plaintiff(s)*

v.

Case No: 2024-CAB-001961Washington Nationals Baseball Club LLC*Defendant(s)***NOTICE AND ACKNOWLEDGMENT OF SERVICE**

To (insert name and address of the party to be served):

Betsy Philpott, General CounselWashington Nationals Baseball Club LLC1500 South Capitol Street, SEWashington, DC 20003

The enclosed summons, complaint, initial order, and any addendum are served in accordance with Superior Court Rule of Civil Procedure 4(c)(5).

Please sign and date the Acknowledgement at the bottom of the page. If you are served on behalf of a corporation, unincorporated association (including a partnership), or other entity, please indicate your relationship to that entity in the space beside your signature. If you are served on behalf of another person and you are authorized to receive process, please indicate your authority in the space beside your signature.

If you do not complete and return the form to the sender within 21 days after it was mailed and you do not show good cause for this failure, you (or the party on whose behalf you are being served) will be required to pay 1) the costs incurred in serving the summons, complaint, initial order, and any addendum in any other manner permitted by law and 2) the reasonable expenses, including attorney's fees, for any motion required to collect those service expenses.

If you do complete and return this form, you (or the party on whose behalf you are being served) must answer the complaint within 21 days after you have signed, dated, and returned the form (or within 60 days if the party being served is the United States, the District of Columbia, or officers or employees of either). If you fail to do so, judgment by default may be entered against you for the relief demanded in the complaint.

This Notice and Acknowledgment of Receipt of Summons, Complaint, Initial Order, and Any Addendum was mailed on (insert date): April 4, 2024.

/ s / Peter Romer-Friedman*Signature*04/04/2024*Date of Signature***ACKNOWLEDGMENT OF RECEIPT OF SUMMONS,
COMPLAINT, INITIAL ORDER, AND ANY ADDENDUM**

I (print name) Betsy Philpott received a copy of the summons, complaint, initial order, and any addendum in the above captioned matter at (insert address): Nationals Park

1500 S. Capitol Street, SEWashington, DC 20003Betsy Philpott*Signature*SVP & General Counsel*Relationship to Defendant/Authority
to Receive Service*Apr 5, 2024*Date of Signature*

Para pedir una traducción, llame al (202) 879-4828

Để có một bản dịch, hãy gọi (202) 879-4828

如需翻译, 请打电话 (202) 879-4828

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Veuillez appeler au (202) 879-4828 pour une traduction

번역을 원하시면, (202) 879-4828 로 전화하십시오

Exhibit 4

Civil Actions

Case Summary

Case No. 2024-CAB-001961

Nick Snyder et al. v. Washington Nationals Baseball Club §
LLC §
§

Location: Civil Actions
Judicial Officer: Matini, Shana Frost
Filed on: 03/28/2024

Case Information

Case Type: Statutory Claim
Subtype: Other
Case Status: 03/28/2024 Open

Assignment Information

Current Case Assignment

Case Number 2024-CAB-001961
Court Civil Actions
Date Assigned 03/28/2024
Judicial Officer Matini, Shana Frost

Party Information

Lead Attorneys

Plaintiff **Coyne, David**
10116 Gates Ave.
Silver Spring, MD 20902


Romer-Friedman, Peter
Retained
202-408-4699(F)
202-355-6364(W)
Peter Romer-Friedman Law PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
peter@prf-law.com


Snyder, Nick
9805 Dallas Ave.
Silver Spring, MD 20901

Romer-Friedman, Peter
Retained
202-408-4699(F)
202-355-6364(W)
Peter Romer-Friedman Law PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
peter@prf-law.com

Defendant **Washington Nationals Baseball Club LLC**
1500 S. Capitol Street SE
Washington, DC 20003


Events and Orders of the Court

03/28/2024  Complaint Filed
No Summons or Information Sheet
Docketed on: 04/01/2024
Filed by: Plaintiff Coyne, David;
Plaintiff Snyder, Nick


04/01/2024  Initial Order [Remote] (Judicial Officer: Matini, Shana Frost)


Case Summary

Case No. 2024-CAB-001961

04/01/2024  Initial Summons Requested as to
Docketed on: 04/02/2024
Party: Plaintiff Snyder, Nick

04/02/2024 Notice

04/07/2024  Affidavit/Declaration of Service of Summons and Complaint
Docketed On: 04/08/2024
Filed By: Plaintiff Snyder, Nick;
Primary Attorney Romer-Friedman, Peter
Served On: Plaintiff Coyne, David

07/19/2024  **Remote Initial Scheduling Conference** (9:30 AM) (Judicial Officer: Matini, Shana Frost)

Financial Information

Plaintiff Snyder, Nick	
Total Financial Assessment	120.00
Total Payments and Credits	120.00
Balance Due as of 04/23/2024	0.00

Exhibit 5

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

Nick Snyder and David Coyne, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

Washington Nationals Baseball Club LLC,

Defendant.

Case No. 2024-CAB-001961

PLEASE TAKE NOTICE that defendant Washington Nationals Baseball Club LLC has filed in the United States District Court for the District of Columbia a Notice of Removal to cause removal of the above-captioned action from the Superior Court of the District of Columbia, Civil Division, to the United States District Court for the District of Columbia. A true and correct copy of the Notice of Removal is attached hereto as Exhibit 1. This notice of filing the Notice of Removal is being filed with the Clerk of the Superior Court of the District of Columbia, Civil Division, to thereby effect removal of the case to the United States District Court for the District of Columbia, and the Superior Court of the District of Columbia shall take no action in this case, unless the case is remanded. *See* 28 U.S.C. § 1446.

Dated: April 23, 2024

Respectfully submitted,

/s/ George Ingham

George Ingham (DC Bar No. 1007658)

HOGAN LOVELLS US LLP

555 Thirteenth Street, NW

Washington, DC 2004

Tel: (202) 637-5600

Fax: (202) 637-5910

George.Ingham@hoganlovells.com

*Attorney for Washington Nationals Baseball
Club LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April 2024 a copy of the foregoing was served on:

Peter Romer-Friedman
PETER ROMER-FRIEDMAN LAW PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
Telephone: (202) 355-6364
Peter@prf-law.com

Ryan Allen Hancock
WILLIG WILLIAMS DAVIDSON
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Telephone: (215) 656-3600
rhancock@wwdlaw.com

*Counsel for the Plaintiffs and the
Proposed Class*

/s/ George Ingham
George Ingham