

LEE LITIGATION GROUP, PLLC
C.K. Lee (2903557)
148 West 24th Street, Eighth Floor
New York, NY 10011
Tel.: 212-465-1188
Fax: 212-465-1181
Attorneys for Plaintiff and the Class

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

PHILLIP SULLIVAN, JR.,
on behalf of himself and the Class,

Case No.:

Plaintiff,

COMPLAINT

-against-

PELOTON INTERACTIVE, INC.,

Defendant.

Plaintiff PHILLIP SULLIVAN (“Plaintiff”) on behalf of himself, by and through his undersigned attorneys, hereby files this Class Action Complaint against Defendant, PELOTON INTERACTIVE, INC. (“Defendant”), and states as follows:

INTRODUCTION

1. This Complaint seeks to remedy civil rights violations committed by Defendant against Plaintiff and all others similarly situated. Defendant has denied, and continues to deny, Plaintiff, a deaf individual, equal access to the same goods, services, and benefits it provides to non-disabled individuals through its Peloton application software (the “Peloton App”), which is available to individuals who purchase a Peloton membership. The Peloton App contains access barriers that make it difficult for Plaintiff and all others who are deaf or hard-of-hearing to reasonably access the Peloton App. Specifically, Defendant’s Peloton App fails to provide closed captioning for its workout videos, as described more fully herein. This lack of captioning makes

it impossible for Plaintiff and all other individuals who are deaf or hard-of-hearing to comprehend the audio portions of videos Defendant makes available through its Peloton App for members such as Plaintiff. Defendant thus denies Plaintiff and all others similarly situated from enjoying equal and reasonable access to the Peloton App, and so too equal usage of the catalog of workout videos, virtual classes, and fitness-related advice they purchase from Defendants. Furthermore, assistive technology is increasingly incorporated into everyday life, which allows individuals who are deaf or hard-of-hearing to reasonably and independently access a variety of services, including online videos. Plaintiff and the Class seek just this type of reasonable and equal access to Defendant's Peloton App.

2. Plaintiff brings this civil rights class action against Defendant for failing to design, construct, and/or own or operate the Peloton App in a manner that is reasonably accessible to, and independently usable by, deaf and hard-of-hearing people.

3. The Peloton App's access barriers prevent deaf and hard-of-hearing individuals from independently watching and comprehending the videos Defendant posts on its Peloton App.

4. Approximately 36 million people in the United States are deaf or hard-of-hearing. Many of these individuals require captioning to meaningfully comprehend the audio portions of video content. Just as buildings without ramps bar people who use wheelchairs, video content without captions excludes deaf and hard-of-hearing individuals. Closed captioning is a viewer-activated system that displays text on, for instance, online videos, television programming, or DVD movies. This is different from open captioning or subtitles, which are burned into the video file and automatically displayed for everyone to see, such as subtitles in foreign language movies. With closed captioning, deaf and hard-of-hearing individuals have the opportunity to watch videos by reading the captioned text.

5. Deaf and hard-of-hearing people watch videos just as aurally uninhibited people do. The lack of closed captioning means that deaf and hard-of-hearing people are excluded from the rapidly expanding Internet media industry and from independently accessing videos posted on the Peloton App.

6. Despite readily available accessible technology, such as the technology in use at other heavily trafficked mobile applications such as YouTube and Netflix—which make use of closed captioning for hard-of-hearing individuals—Defendant has failed to do the same, thereby denying individuals who are deaf and hard-of-hearing from reasonably accessing audio portions of Defendant’s Peloton App. Without closed captioning, deaf and hard-of-hearing people cannot comprehend the audio portion of the videos on the Peloton App.

7. By failing to make the Peloton App accessible to deaf and hard-of-hearing persons, Defendant is violating basic equal access requirements under state law.

8. New York state law requires places of public accommodation to ensure access to goods, services, and facilities by making reasonable accommodations for persons with disabilities.

9. Plaintiff, from his apartment in New York County, attempted to browse and watch the “10 Minutes Stretching,” “10 Minutes Arm Toning,” and “3 Minute Warm-Up” videos on the Peloton App most recently on October 16, 2020. However, Plaintiff was not able to reasonably comprehend any of the videos due to their lack of closed captioning. These are but a few examples of videos on Defendant’s Peloton App that fail to include close captioning. Unless Defendant remedies these access barriers on the Peloton App, Plaintiff and Class members will continue to be unable to reasonably access videos posted on the Peloton App, which were created for individuals such as Plaintiff who had purchased Defendant’s membership.

10. This complaint seeks declaratory and injunctive relief to correct Defendant's policies and practices, which includes but is not necessarily limited to the following: implementing the necessary measures to ensure that the Peloton App is in compliance with state law; the continued monitoring of such measures; and to update and remove accessibility barriers on the Peloton App to conform to WCAG 2.1 A and AA Standards such that Plaintiff and all other similarly situated deaf and hard-of-hearing individuals will be able to reasonably access the videos posted on the Peloton App.

JURISDICTION AND VENUE

11. This is an action for declaratory and injunctive relief brought pursuant to the New York State Human Rights Law, N.Y. Exec. Law, Article 15 (Executive Law § 290 *et seq.*) ("NYS HRL") and the New York City Human Rights Law, N.Y.C. Administrative Code § 8-101 *et seq.* ("NYC HRL" or "City law"). The Court has power to issue such relief pursuant to N.Y. C.P.L.R. § 6301.

12. The Court has subject matter jurisdiction over the action over the NYS HRL and NYC HRL claims pursuant to 28 U.S.C. § 1367.

13. Following the commencement of this action, a copy of this Complaint will be served both on the New York City Commission for Human Rights and the Office of the Corporation Counsel of the City of New York, thereby satisfying the notice requirements of the New York City Administrative Code.

14. Venue is proper pursuant to N.Y. C.P.L.R. § 503(a) based on the residence of Plaintiff. Plaintiff is a resident of New York, New York State. Defendant is subject to personal jurisdiction in this State because Defendant has established minimum contacts in the forum state: a substantial part of the acts and omissions giving rise to Plaintiff's claims have occurred in New

York State when Plaintiff attempted to access the Peloton App in New York, New York. Additionally, Defendant has been and is committing the unlawful acts alleged herein in New York State; has been and is violating the rights of deaf and hard-of-hearing individuals in New York State; and has been and is causing injury to deaf and hard-of-hearing individuals in New York State.

PARTIES

15. Plaintiff is a resident of New York, New York.

16. Plaintiff is legally deaf and therefore a member of a protected class under the New York State Human Rights Law, and the New York City Human Rights Law. Plaintiff cannot access the audio portion of a video without the assistance of closed captioning. Due to the Peloton App's lack of closed captioning, Plaintiff has been denied reasonable access to the goods, services, and benefits offered through Defendant's Peloton App. Most recently in October 2020, Plaintiff attempted to watch several videos on the Peloton App, including "10 Minutes Stretching," but could not comprehend the content of the videos due to their lack of closed captioning. Plaintiff has experienced a similar lack of captioning issues with other videos posted on the Peloton App, as provided below. The general inaccessibility of the Peloton App has deterred Plaintiff and all other similarly situated deaf and hard-of-hearing individuals from reasonably accessing the Peloton App.

17. Defendant is an American for-profit corporation organized under the laws of the State of New York and is registered in the State of New York to do business. Defendant has a principal executive office located at 125 West 25th Street, 11th Floor, New York, NY 10001.

18. Defendant owns and operates the Peloton App, a place of public accommodation which focuses on providing training programs, training tips, virtual classes, and workout videos for Defendant's customers. Specifically, Defendant offers through the Peloton App goods and

services, such as helpful tips for physical training, instructional workout videos, personal metrics tracking, challenges, a log of achievements, and more. Through its Peloton App, Defendant markets its goods and services to persons residing in New York State such that Defendant has established minimum contacts with New York State and can therefore reasonably be expected to litigate claims in New York State.

19. Plaintiff seeks, on behalf of himself and other similarly situated deaf and hard-of-hearing individuals, reasonable and equal access to the goods, services, and benefits provided by Defendant through the Peloton App.

FACTUAL ALLEGATIONS

20. Defendant operates the Peloton App, which offers a catalog of thousands of workout videos, training programs, tips for physical training, , and a log of the member's physical activity and progress. Defendant's Peloton App thus delivers information, entertainment, and education to thousands of people across the United States. Defendant's Peloton App videos can be streamed on cell phones, computers, tablets, and Roku.

21. The Peloton App is a service and benefit offered by Defendant throughout the United States, including New York State. The Peloton App is owned, controlled, and/or operated by Defendant.

22. The deaf and hard-of-hearing access videos through closed captioning, which is a transcription or translation of the audio portion of a video as it occurs, sometimes including description of non-speech elements. Except for a deaf or hard-of-hearing person whose residual hearing is still sufficient to apprehend the audio portion of the video, closed captioning provides the only method by which a deaf or hard-of-hearing person can independently access the video. Unless mobile applications, desktop applications, and websites are designed to allow for use in

this manner, deaf and hard-of-hearing persons are unable to reasonably access the service provided through the videos on a given application or website.

23. This case arises out of Defendant's failure to provide individuals who are deaf and hard-of-hearing with reasonable access to the Peloton App's goods, services, and benefits. Specifically, Defendant's lack of captioning for videos posted on its Peloton App unlawfully prevents Plaintiff and others similarly situated from reasonably accessing the audio portions of those videos. This lack of closed captioning inhibits Plaintiff and the Class' ability to reasonably and independently comprehend the content of the Peloton App's videos.

24. There are well-established guidelines for making mobile and desktop applications accessible to disabled individuals. These guidelines have been in place for several years and have been followed successfully by other large business entities in making their application software accessible. The Web Accessibility Initiative ("WAI"), a project of the World Wide Web Consortium which is the leading standards organization of the Web, has developed guidelines for software accessibility, called the Web Content Accessibility Guidelines ("WCAG"). The federal government has also promulgated software accessibility standards under Section 508 of the Rehabilitation Act. These guidelines are readily available via the Internet, so that a business designing application software can easily access them. These guidelines recommend several basic components for making websites and desktop and mobile applications accessible, including but not limited to adding closed captioning to video content.

25. The Peloton App contains access barriers that prevent free and full use by Plaintiff and other deaf or hard-of-hearing persons, including but not limited to the lack of closed captioning. This barrier is in violation of WCAG 2.1 Guideline 1.2.2, which mandates that video content contain captioning.

26. Due to the Peloton App's inaccessibility, Plaintiff cannot access certain audio portions of videos posted by Defendant. Deaf and hard-of-hearing individuals may thus require an interpreter to comprehend the audio portion of the video, or otherwise require assistance from a friend or family member to relate video content posted on the Peloton App. Yet if the Peloton App was rendered more accessible by including closed captioning, deaf and hard-of-hearing individuals could independently access the Peloton App's goods, services, and benefits.

27. The Peloton App thus contains access barriers which deny reasonable and equal access to Plaintiff, and all other similarly situated deaf and hard-of-hearing individuals in New York State.

28. Plaintiff attempted to independently watch the "10 Minute Stretching" video posted on the Peloton App but was unable to do so due to the video's the lack of closed captioning. Plaintiff similarly experienced lack of captioning with the following Peloton App videos: "2 Minute Warm-Up," "3 Minute Warm-Up," and "10 Minute Arm Toning," among many others.

29. Plaintiff thus possesses actual knowledge of the fact that the Peloton App contains barriers which unlawfully deny he and all others similarly situated with reasonable access to the videos Defendant posts on its Peloton App.

30. These access barriers have denied Plaintiff and the Class with reasonable and equal access to the goods, services, and benefits offered by Defendant through its Peloton App.

31. Defendant has therefore engaged, and continues to engage in, acts of discrimination, including but not limited to the following:

- (a) constructing and maintaining application software that is inaccessible to deaf and hard-of-hearing individuals; and/or
- (b) constructing and maintaining application software that is insufficiently

intuitive and/or obviously inaccessible to deaf and hard-of hearing individuals;
and/or

(c) failing to take actions to correct access barriers in the face of the
aforementioned injury and discrimination to deaf and hard-of-hearing
individuals.

32. Defendant utilizes standards, criteria, and methods of administration that have the
effect of discriminating or perpetuating the discrimination against individuals who are deaf and
hard-of-hearing, such as Plaintiff.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

**(Violation of New York State Human Rights Law, N.Y. Exec. Law,
Article 15 (Executive Law § 292 *et seq.*)
(on behalf of Plaintiff)**

33. Plaintiff realleges and incorporates by reference the foregoing allegations as
though fully set forth herein.

34. N.Y. Exec. Law § 296(2)(a) provides that it is “an unlawful discriminatory
practice for any person, being the owner, lessee, proprietor, manager, superintendent, agent or
employee of any place of public accommodation . . . because of the . . . disability of any person,
directly or indirectly, to refuse, withhold from or deny to such person any of the
accommodations, advantages, facilities or privileges thereof.”

35. Defendant operates a place of public accommodation as defined by N.Y. Exec.
Law § 292(9).

36. Defendant is subject to New York Human Rights Law because it owns and operates
the Peloton App. Defendant is a person within the meaning of N.Y. Exec. Law § 292(1).

37. Defendant is violating N.Y. Exec. Law § 296(2)(a) in refusing to update or remove access barriers to the Peloton App, causing the videos displayed on the Peloton App to be inaccessible to the deaf and hard-of-hearing. This inaccessibility denies deaf and hard-of-hearing patrons reasonable and equal access to the facilities, goods and services that Defendant makes available to the non-disabled public.

38. Specifically, under N.Y. Exec. Law § 296(2)(c)(I), unlawful discriminatory practices include, *inter alia*, “a refusal to make reasonable modifications in policies, practices, or procedures, when such modifications are necessary to afford facilities, privileges, advantages or accommodations to individuals with disabilities, unless such person can demonstrate that making such modifications would fundamentally alter the nature of such facilities, privileges, advantages or accommodations.”

39. In addition, under N.Y. Exec. Law § 296(2)(c)(II), unlawful discriminatory practices include, “a refusal to take such steps as may be necessary to ensure that no individual with a disability is excluded or denied services because of the absence of auxiliary aids and services, unless such person can demonstrate that taking such steps would fundamentally alter the nature of the facility, privilege, advantage or accommodation being offered or would result in an undue burden.”

40. Defendant’s actions amount to discrimination against Plaintiff and the Class on the basis of their disability, in violation of the New York State Human Rights Law, N.Y. Exc. Law § 296(2). Specifically, Defendant has:

- (a) constructed and maintained application software that is inaccessible to deaf and hard-of-hearing individuals; and/or
- (b) constructed and maintained application software that is insufficiently intuitive

and/or obviously inaccessible to deaf and hard-of-hearing individuals; and/or

(c) failed to take proper remedial actions to correct these access barriers which injure and discriminate against deaf and hard-of-hearing individuals.

41. Defendant has failed to take any prompt and equitable steps to remedy its discriminatory conduct. These violations are ongoing.

42. As such, Defendant discriminates, and will continue in the future to discriminate against Plaintiff on the basis of disability in the reasonable and equal enjoyment of the goods, services, facilities, privileges, advantages, accommodations and/or opportunities of the Peloton App under § 296(2) *et seq.* and/or its implementing regulations. Unless the Court enjoins Defendant from continuing to engage in these unlawful practices, Plaintiff will continue to suffer irreparable harm.

43. The actions of Defendant were and are in violation of New York State Human Rights Law and therefore Plaintiff invokes Plaintiff's right to injunctive relief to remedy the discrimination.

44. Plaintiff is also entitled to compensatory damages, as well as civil penalties and fines pursuant to N.Y. Exc. Law § 297(4)(c) *et seq.* for each and every offense.

45. Plaintiff is also entitled to reasonable attorneys' fees and costs.

46. Pursuant to N.Y. Exec. Law § 297 and the remedies, procedures, and rights set forth and incorporated therein Plaintiff prays for judgment as set forth below.

SECOND CAUSE OF ACTION

**(Violation of New York State Civil Rights Law, NY CLS Civ R,
Article 4 (CLS Civ R § 40 *et seq.*)
(on behalf of Plaintiff)**

47. Plaintiff served notice thereof upon the attorney general as required by N.Y.

Civil Rights Law § 41.

48. Plaintiff realleges and incorporates by reference the foregoing allegations as though fully set forth herein.

49. N.Y. Civil Rights Law § 40 provides that “all persons within the jurisdiction of this state shall be entitled to the reasonable and equal accommodations, advantages, facilities and privileges of any places of public accommodations, resort or amusement, subject only to the conditions and limitations established by law and applicable alike to all persons. No persons, being the owner, lessee, proprietor, manager, superintendent, agent, or employee of any such place shall directly or indirectly refuse, withhold from, or deny to any person any of the accommodations, advantages, facilities and privileges thereof”

50. N.Y. Civil Rights Law § 40-c(2) provides that “no person because of . . . disability, as such term is defined in section two hundred ninety-two of executive law, be subjected to any discrimination in his or her civil rights, or to any harassment, as defined in section 240.25 of the penal law, in the exercise thereof, by any other person or by any firm, corporation or institution, or by the state or any agency or subdivision.”

51. The Peloton App is a public accommodations within the definition of N.Y. Civil Rights Law § 40-c(2).

52. Defendant is subject to New York Civil Rights Law because it owns and operates the Peloton App. Defendant is a person within the meaning of N.Y. Civil Law § 40-c(2).

53. Defendant is violating N.Y. Civil Rights Law § 40-c(2) in refusing to update or remove access barriers to the Peloton App, causing videos on the Peloton App to be completely inaccessible to the deaf and hard-of-hearing. This inaccessibility denies deaf and hard-of-hearing patrons reasonable and equal access to the goods and services that Defendant makes available to

the non-disabled public.

54. In addition, N.Y. Civil Rights Law § 41 states that “any corporation which shall violate any of the provisions of sections forty, forty-a, forty-b or forty-two . . . shall for each and every violation thereof be liable to a penalty of not less than one hundred dollars nor more than five hundred dollars, to be recovered by the person aggrieved thereby”

55. Specifically, under N.Y. Civil Rights Law § 40-d, “any person who shall violate any of the provisions of the foregoing section, or subdivision three of section 240.30 or section 240.31 of the penal law, or who shall aid or incite the violation of any of said provisions shall for each and every violation thereof be liable to a penalty of not less than one hundred dollars nor more than five hundred dollars, to be recovered by the person aggrieved thereby in any court of competent jurisdiction in the county in which the defendant shall reside”

56. Defendant has failed to take any prompt and equitable steps to remedy its discriminatory conduct. These violations are ongoing.

57. As such, Defendant discriminates, and will continue in the future to discriminate against Plaintiff on the basis of disability are being directly or indirectly refused, withheld from, or denied the accommodations, advantages, facilities and privileges thereof in § 40 *et seq.* and/or its implementing regulations.

58. Plaintiff is entitled to compensatory damages of five hundred dollars per instance, as well as civil penalties and fines pursuant to N.Y. Civil Law § 40 *et seq.* for each and every offense.

THIRD CAUSE OF ACTION

**(Violation of New York City Human Rights Law,
N.Y.C. Administrative Code § 8-102, *et seq.*)
(on behalf of Plaintiff)**

59. Plaintiff realleges and incorporates by reference the foregoing allegations as if

set forth fully herein.

60. N.Y.C. Administrative Code § 8-107(4)(a) provides that “It shall be an unlawful discriminatory practice for any person who is the owner, franchisor, franchisee, lessor, lessee, proprietor, manager, superintendent, agent or employee of any place or provider of public accommodation . . . [b]ecause of any person’s . . . disability . . . directly or indirectly . . . [t]o refuse, withhold from or deny to such person the reasonable and equal enjoyment, on equal terms and conditions, of any of the accommodations, advantages, services, facilities or privileges of the place or provider of public accommodation”.

61. The Peloton App is a public accommodation within the definition of N.Y.C. Administrative Code § 8-102(9).

62. Defendant is subject to City Law because it owns and operates the Peloton App. Defendant is a person within the meaning of N.Y.C. Administrative Code § 8-102(1).

63. Defendant is violating N.Y.C. Administrative Code § 8-107(4)(a) in refusing to update or remove access barriers to the Peloton App, causing the Peloton App and the services integrated with the Peloton App to be completely inaccessible to the deaf. This inaccessibility denies deaf patrons reasonable and equal access to the facilities, goods, and services that Defendant makes available to the non-disabled public. Specifically, Defendant is required to “make reasonable accommodation to the needs of persons with disabilities . . . it is an unlawful discriminatory practice for any person prohibited by the provisions of [§ 8-107 *et seq.*] from discriminating on the basis of disability not to provide a reasonable accommodation to enable a person with a disability to . . . enjoy the right or rights in question provided that the disability is known or should have been known by the covered entity.” N.Y.C. Administrative Code § 8-107(15)(a).

64. Defendant’s actions constitute willful intentional discrimination against the

Plaintiff on the basis of a disability in violation of the N.Y.C. Administrative Code § 8-107(4)(a) and § 8107(15)(a) in that Defendant has:

- (a) constructed and maintained application software that is inaccessible to deaf and hard-of-hearing Individuals with knowledge of the discrimination; and/or
- (b) constructed and maintained application software that is sufficiently intuitive and/or obvious that is inaccessible to deaf and hard-of-hearing individuals; and/or
- (c) failed to take proper remedial actions to correct these access barriers in the face of substantial harm and discrimination to deaf and hard-of-hearing individuals.

65. Defendant has failed to take any prompt and equitable steps to remedy its discriminatory conduct. These violations are ongoing.

66. As such, Defendant discriminates, and will continue in the future to discriminate against Plaintiff on the basis of disability in the reasonable and equal enjoyment of the goods, services, facilities, privileges, advantages, accommodations, and/or opportunities of the Peloton App under § 8-107(4)(a) and/or its implementing regulations. Unless the Court enjoins Defendant from continuing to engage in these unlawful practices, Plaintiff will continue to suffer irreparable harm.

67. The actions of Defendant were and are in violation of City Law and therefore Plaintiff invokes Plaintiff's right to injunctive relief to remedy the discrimination.

68. Plaintiff is also entitled to compensatory damages, as well as civil penalties and fines under N.Y.C. Administrative Code § 8-120(a)(8) and § 8-126(a) for each offense.

69. Plaintiff is also entitled to reasonable attorneys' fees and costs.

70. Pursuant to N.Y.C. Administrative Code § 8-120 and § 8-126 and the remedies, procedures, and rights set forth and incorporated therein Plaintiff prays for judgment as set forth below.

FOURTH CAUSE OF ACTION

**(Declaratory Relief)
(on behalf of Plaintiff)**

71. Plaintiff realleges and incorporates by reference the foregoing allegations as if set forth fully herein.

72. An actual controversy has arisen and now exists between the parties in that Plaintiff contends, and is informed and believes that Defendant denies, that the Peloton App contains access barriers denying deaf and hard-of-hearing individuals the reasonable and equal access to the goods and services of the Peloton App, which Defendant owns, operates, and/or controls, fails to comply with applicable laws including, but not limited to, Title III of the Americans with Disabilities Act, 42 U.S.C. § 12182, *et seq.*, N.Y. Exec. Law § 296, *et seq.*, and N.Y.C. Administrative Code § 8-107, *et seq.* prohibiting discrimination against the deaf and hard-of-hearing.

73. A judicial declaration is necessary and appropriate at this time in order that each of the parties may know their respective rights and duties and act accordingly.

WHEREFORE, Plaintiff prays for judgment as set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests relief as follows:

74. A preliminary and permanent injunction to prohibit Defendant from violating the N.Y. Exec. Law § 296, *et seq.*, N.Y.C. Administrative Code § 8-107, *et seq.*, and the laws of New York;

75. A preliminary and permanent injunction requiring Defendant to take all the steps necessary to make the Peloton App fully functional and compliant with WCAG 2.1 A and AA Standards, so that the Peloton App is readily accessible to and usable by deaf and hard-of-hearing individuals and other individuals with impairments, such as those who are visually impaired.

76. A declaration that Defendant owns, maintains, and/or operates the Peloton App in a manner which discriminates against the deaf and hard-of-hearing, and which fails to provide access for persons with disabilities as required by N.Y. Exec. Law § 296, *et seq.*, N.Y.C. Administrative Code § 8-107, *et seq.*, and the laws of New York;

77. Compensatory damages in an amount to be determined by proof, including all applicable statutory damages and fines, to Plaintiff for violations of their civil rights under New York State Human Rights Law and City Law;

78. Plaintiff's reasonable attorneys' fees, statutory damages, expenses, and costs of suit as provided by state and federal law;

79. For pre- and post-judgment interest to the extent permitted by law; and

80. Such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable as of right by jury.

DATED: December 10, 2020

LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee

C.K. Lee, Esq. (2093557)
148 West 24th Street, 8th Floor
New York, NY 10011
Tel.: (212) 465-1188
cklee@leelitigation.com

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Deaf Users Harmed by Lack of Closed Captioning in Peloton Workout Videos, Class Action Claims](#)
