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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

WILLIAM BREIT and KATHLEEN
CHRISTOFF,

Plaintiffs,

v.

LAGUNA BEACH UNIFIED SCHOOL
DISTRICT; and DOES 1 through 10,
inclusive,

Defendants.

Case No.

**COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF FOR
VIOLATION OF THE AMERICANS
WITH DISABILITIES ACT AND
SECTION 504 OF THE
REHABILITATION ACT**

Plaintiffs WILLIAM BREIT and KATHLEEN CHRISTOFF (collectively,
“Plaintiffs”), by and through their undersigned counsel, bring this action against
Defendant LAGUNA BEACH UNIFIED SCHOOL DISTRICT (“the District” or
“Defendant”), and allege as follows:

Preliminary Statement

1. This is a civil rights action arising under Title II of the Americans with
Disabilities Act (“ADA”), 42 U.S.C. §§ 12131 *et seq.*, its implementing regulations,
28 C.F.R. Part 35, Section 504 of the Rehabilitation Act, and California Government
Code § 11135. Plaintiffs seek declaratory and injunctive relief to prevent Defendant

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1 from holding the high school graduation ceremony at a venue that is inaccessible and
2 non-compliant with these laws.

3 2. Plaintiffs are individuals with physical mobility disabilities, including
4 mobility-assistance-device users who will be joined by their companions, all of whom
5 are invitees of graduating students at Defendant’s high school, Laguna Beach High
6 School. The graduation ceremony of the high school’s senior class is a once-in-a-
7 lifetime milestone event. Contrary to Defendant’s long-standing practice to hold the
8 graduation ceremony at Laguna Beach High School’s Guyer Field, Defendant has
9 elected to hold this year’s graduation ceremony at the Irvine Bowl. Defendant’s
10 decision to relocate the graduation to the Irvine Bowl—an arena/bowl that provides
11 only eleven (11) wheelchair-accessible spaces and twelve (12) companion seats for
12 an anticipated attendance of 800 to 1,000 persons—will effectively exclude Plaintiffs
13 and other similarly situated persons with disabilities from participating in this event
14 on equal terms with non-disabled attendees, in direct violation of the ADA, the
15 Rehabilitation Act, and Cal. Gov’t Code § 11135. For example, the ADA Title II
16 regulations require that wheelchair-accessible spaces be dispersed throughout a venue
17 so that persons with disabilities may choose seating in a variety of locations
18 comparable to those available to non-disabled attendees. *See* 2010 ADA Standards
19 for Accessible Design, § 221.2.3; *see also* Cal. Building Code § 11B-221. The Irvine
20 Bowl does not comply with the governing legal requirements: its designated
21 wheelchair-accessible spaces are not dispersed throughout the venue but instead are
22 clustered in only three areas of the steep hillside amphitheater. One cluster is located
23 in the very front row, conspicuously singling out persons with disabilities and
24 subjecting them to conditions that are separate and unequal from the general seating.
25 The second cluster is located on the same side in the front row of the second section.
26 The third cluster is completely segregated from the rest of the seating. ADA Title II
27 further requires that accessible seating be integrated so as not to stigmatize or draw
28 undue attention to persons with disabilities. The placement of accessible spaces at

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1 the front row, the lack of horizontal dispersion, and the complete segregation of one
2 cluster of wheelchair-accessible spaces violates this integration mandate.
3 Additionally, the Irvine Bowl provides only one companion seat per wheelchair space,
4 preventing family members from sitting together as a unit—a further form of
5 discrimination that denies persons with disabilities the equal opportunity to
6 experience the graduation ceremony alongside their families.

7 3. Plaintiffs seek: (a) a declaration that Defendant's conduct violates Title
8 II of the ADA, the Rehabilitation Act, and Cal. Gov't Code § 11135; and (b)
9 temporary, preliminary, and permanent injunctive relief prohibiting Defendant from
10 holding the graduation ceremony at the Irvine Bowl or an alternative venue that does
11 not comply with these laws.

12 **The Parties**

13 4. Plaintiffs are individuals who will be attending the graduation on June
14 11, 2026. Each Plaintiff is a person with a disability within the meaning of 42 U.S.C.
15 § 12102, specifically individuals who use mobility-assistance devices, assisted by
16 their companions, and invited to attend the graduation ceremony of a graduating
17 student enrolled at Defendant's high school. Each Plaintiff has a concrete and
18 personal stake in attending the graduation ceremony and will suffer direct and
19 irreparable harm if the graduation is held at the inaccessible and non-compliant Irvine
20 Bowl. Plaintiff WILLIAM BREIT is 73 years of age and domiciled in, and a resident
21 of, Virginia Beach, Virginia. KATHLEEN CHRISTOFF is 81 years of age and
22 domiciled in, and a resident of, Laguna Hills, Orange County, California.

23 5. Defendant LAGUNA BEACH UNIFIED SCHOOL DISTRICT is a
24 public school district organized and existing under the laws of the State of California,
25 with its principal offices located in Laguna Beach, Orange County, California.
26 Defendant is a "public entity" within the meaning of Title II of the ADA, 42 U.S.C.
27 § 12131(1). Defendant administers, supervises, and controls the high school and the
28 events associated therewith, including the annual graduation ceremony that is the

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1 subject of this action.

2 **Jurisdiction and Venue**

3 6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331
4 and 28 U.S.C. § 1343(a)(3)-(4), as this action arises under the Americans with
5 Disabilities Act, 42 U.S.C. §§ 12101 *et seq.*, and Section 504 of the Rehabilitation
6 Act of 1973, 29 U.S.C. § 794.

7 7. This court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367
8 for claims arising under Cal. Gov’t Code § 11135 as the claims are so related to those
9 arising under the federal claims (Americans with Disabilities Act and Section 504 of
10 the Rehabilitation Act of 1973) that they form part of the same case or controversy.

11 8. This Court also has jurisdiction to grant declaratory relief pursuant to 28
12 U.S.C. §§ 2201–2202 and Fed. R. Civ. P. 57.

13 9. Venue is proper in this District and, more specifically, in the Southern
14 Division under 28 U.S.C. § 1391(b) because Defendant is located in Orange County,
15 California, all of the events and omissions giving rise to the claims occurred and are
16 occurring in Orange County, California, and the high school and the Irvine Bowl are
17 both located in Orange County, California.

18 **FACTUAL ALLEGATIONS**

19 **Background**

20 10. Defendant operates Laguna Beach High School, a public high school
21 located in Orange County, California (the “High School”). The High School holds an
22 annual graduation ceremony to celebrate the graduation of its senior class.

23 11. For at least each of the five (5) consecutive years preceding the events
24 described herein, Defendant has held the graduation ceremony on the grounds of the
25 High School (the “High School Venue”). The High School Venue is equipped with
26 sufficient accessible seating to accommodate mobility-assistance-device users and
27 their assisting companions in a manner consistent with the requirements of Title II of
28 the ADA, the Rehabilitation Act, and Cal. Gov’t Code § 11135.

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1 12. Upon information and belief, approximately 215 students are expected
2 to graduate in the upcoming graduation ceremony, which is scheduled for June 11,
3 2026. With an average of multiple family members and invitees per graduate, total
4 attendance is anticipated to be very substantial, not even taking into account the
5 graduates themselves and the faculty and other high school administrators in
6 attendance. The Defendant is offering up to 10 seats for each graduate’s invitees and
7 family members.

8 13. Each Plaintiff (and their assisting companions) is an invitee of a
9 graduating student and has made plans and arrangements to attend the graduation
10 ceremony. Plaintiffs include individuals who use mobility-assistance devices and
11 they will be accompanied by companions, all of whom require accessible seating and
12 companion seating in proximity thereto.

13 **Defendant’s Decision to Relocate Graduation to the Irvine Bowl**

14 14. On February 26, 2026, the Laguna Beach Unified School District Board
15 of Education voted, in a split 3-2 decision, to relocate the graduation ceremony from
16 Guyer Field at Laguna Beach High School to the Irvine Bowl without first conducting
17 a formal ADA accessibility evaluation of the Irvine Bowl. This critical omission is
18 established by the District’s own response to a California Public Records Act (“PRA”)
19 request submitted on March 11, 2026, which the District answered on April 2, 2026:
20 that response confirms that no pre-vote ADA evaluation was conducted before the
21 Board approved the venue change. The Board’s February 26, 2026 decision was itself
22 procedurally improper, as the record reflects that the vote was the product of illegal
23 hub-and-spoke serial meetings in violation of the Ralph M. Brown Act, California
24 Government Code §§ 54950 *et seq.* Upon receiving the District’s PRA response on
25 April 2, 2026, the Board members and Superintendent Dr. Jason Glass were
26 immediately notified in writing and demanded that the District relocate graduation,
27 now that the absence of any pre-vote ADA evaluation had been confirmed on the
28 public record. That written demand expressly stated that failure to comply would

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1 leave no choice but to pursue all available legal remedies, including filing a complaint
2 with the U.S. Department of Education Office for Civil Rights (which has since been
3 filed) and seeking injunctive relief in federal court to enforce the District’s obligations
4 under governing laws, including Title II of the ADA and Section 504 of the
5 Rehabilitation Act. A written response was requested by April 16, 2026. To date, the
6 District has provided no acknowledgment of that demand whatsoever.

7 15. On May 7, 2026, during a Parent Teacher Association (“PTA”) Council
8 meeting held in the District’s Room 91, PTA Members again expressed to Defendant
9 concerns that the Irvine Bowl is unsuitable to serve as a proper, disability-compliant
10 venue for a public high school graduation. PTA Members further expressed concern
11 that, should they be forced to pursue legal remedies, it is foreseeable that Defendant
12 could be enjoined from holding the graduation ceremony at the Irvine Bowl. In
13 response, Superintendent Dr. Glass stated that, if enjoined even a week before the
14 graduation, it would be “no problem” because Defendant would be able to “easily
15 pivot” to hold the graduation at Guyer Field as originally planned.

16 **Limitations of the Irvine Bowl**

17 16. With a maximum capacity of 2,600, the Irvine Bowl provides only
18 eleven (11) designated wheelchair-accessible spaces and twelve (12) companion seats
19 for the entirety of its seating capacity. These spaces are not dispersed throughout the
20 venue as required by law; rather, they are clustered in only three areas of the steep
21 hillside amphitheater, including one cluster in the very front row directly in front of
22 the stage, one cluster on the same side in the front row of the second section, and one
23 cluster completely segregated from the rest of the seating.

24 17. Eleven wheelchair spaces and twelve companion seats are wholly
25 inadequate for an event anticipated to draw well over 800 attendees and fall far short
26 of the accessible seating requirements mandated by the ADA and its implementing
27 regulations, as well as California law. *See* 2010 ADA Standards for Accessible
28 Design, §§ 221, 802; Cal. Building Code § 11B-221; Cal. Gov’t Code § 11135.

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1 18. The Irvine Bowl’s physical approach presents independent and severe
2 accessibility barriers. The pathways leading from parking areas and public
3 transportation drop-off points to the venue’s entrance at the very top of the hill are
4 steep and irregular, posing substantial obstacles for mobility-assistance device users
5 and other individuals with mobility impairments. These access routes do not comply
6 with the ADA’s requirements for accessible routes, which mandate that routes
7 connecting accessible parking spaces, passenger loading zones, and public streets to
8 accessible building entrances be stable, firm, and not exceed maximum slope
9 requirements. As a result, the Plaintiffs, as all others similarly situated, would be
10 unable to travel from the point of arrival to the venue entrance without assistance or
11 would be wholly prevented from doing so, effectively barring them from the event
12 before they even reach the seating area.

13 19. Even for those mobility-assistance device users who are able to reach the
14 venue entrance at the very top of the hill, the interior of the Irvine Bowl presents
15 equally prohibitive obstacles. The Irvine Bowl is a steep hillside amphitheater, and
16 circulation within the venue—including movement between the entrance and the
17 designated accessible seating areas—requires traversing sharply graded terrain. The
18 ADA requires that accessible routes within assembly areas meet the same slope and
19 surface standards applicable to exterior accessible routes. The interior grade of the
20 Irvine Bowl renders navigation by wheelchair users and other individuals with
21 mobility impairments extremely difficult and, in many cases, dangerous without
22 assistance. These interior access barriers compound the inadequacy of the venue’s
23 accessible seating and further underscore the Irvine Bowl’s fundamental
24 incompatibility with the ADA’s requirements for an accessible public event.

25 **Exclusionary Impact of the Irvine Bowl on Plaintiffs**

26 20. Each Plaintiff who uses a mobility-assistance device will be unable to
27 obtain adequate accessible and companion seating at the Irvine Bowl given the
28 woefully insufficient number of such seats. The Plaintiffs will be entirely unable to

1 attend the graduation ceremony if it is held at the Irvine Bowl.

2 21. The inaccessibility of the Irvine Bowl renders meaningful participation
3 by Plaintiffs in the graduation ceremony infeasible and physically impossible.

4 22. The District’s late-February 2026 decision to change the graduation
5 location to the Irvine Bowl further underscores the absence of any cognizable
6 operational justification for changing the status quo and moving the graduation to that
7 location. By contrast, all planning for the graduation had already been completed by
8 on-site administrators, teachers, and the graduation committee for the Class of 2026’s
9 graduation on Guyer Field at Laguna Beach High School, just as it had taken place
10 there for each of the past (at least) five consecutive years. Accordingly, the District
11 cannot credibly argue that maintaining the status quo by keeping the graduation at
12 Guyer Field would be disruptive, prohibitively expensive, operationally impractical,
13 unsafe, or impossible, even on short notice. As Dr. Glass expressly stated in his
14 remarks to the PTA Council on May 7, 2026, if Defendant is enjoined even a week
15 before the June 11 graduation, it would be “no problem” because Defendant would
16 be able to “easily pivot” to hold the graduation at Guyer Field as originally planned.

17 **Plaintiffs’ Pre-Suit Demands**

18 23. Before filing this Complaint, Plaintiffs and others similarly situated
19 transmitted written demands to Defendant notifying Defendant of the legal
20 deficiencies of the Irvine Bowl and demanding that Defendant maintain the
21 graduation ceremony at the High School venue, consistent with its practice for at least
22 the past five consecutive years.

23 24. Notwithstanding receipt of those written demands, Defendant has failed
24 and refused to agree to maintain the graduation at the High School or to otherwise
25 cure the disability deficiencies identified by Plaintiffs.

26 25. As a result of Defendant's refusal, Plaintiffs have no adequate remedy at
27 law and are compelled to seek emergency injunctive and declaratory relief from this
28 Court.

1 26. Defendants have previously stated that, if an injunction were to issue
2 even up to a week before the graduation, they could easily pivot and hold the
3 graduation at the High School as originally planned.

4 27. On Thursday, May 28, 2026, prior to the filing of this Complaint, counsel
5 for Plaintiffs attempted to resolve this matter by notifying Laguna Beach Unified
6 School District that a lawsuit would be filed if the graduation ceremony was relocated
7 to the Irvine Bowl. Counsel for Laguna Beach Unified School District responded on
8 Friday, May 29, 2026 that it would be difficult to hold the graduation at the high
9 school as was originally planned, citing monetary costs and staff time expended on
10 holding the graduation at the Irvine Bowl.

11 28. Any claim by Laguna Beach Unified School District that it would be too
12 expensive or burdensome to hold the graduation at the high school as originally
13 planned is inaccurate and irrelevant. Enabling equal access to disabled individuals is
14 not about expense or burden: it is about following the law.

15
16 **FIRST CLAIM FOR RELIEF**

17 **Violation of Title II of the Americans with Disabilities Act, 42 U.S.C. § 12132**

18 29. Plaintiffs incorporate by reference all preceding paragraphs as though
19 fully set forth herein.

20 30. Title II of the ADA provides that “no qualified individual with a
21 disability shall, by reason of such disability, be excluded from participation in or be
22 denied the benefits of the services, programs, or activities of a public entity, or be
23 subjected to discrimination by any such entity.” 42 U.S.C. § 12132.

24 31. Defendant is a “public entity” within the meaning of 42 U.S.C. §
25 12131(1)(B) and is therefore subject to the requirements of Title II of the ADA.

26 32. Each Plaintiff is a “qualified individual with a disability” within the
27 meaning of 42 U.S.C. § 12131(2), in that each Plaintiff has a physical impairment—
28 specifically, a mobility disability requiring use of a mobility-assistance device—that

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1 substantially limits one or more major life activities including walking, or is
2 associated with such a person.

3 33. The graduation ceremony is a service, program, or activity of a public
4 entity within the meaning of 42 U.S.C. § 12132, as it is a school-sponsored event
5 organized, administered, and conducted by Defendant.

6 34. Defendant’s obligation to provide accessible programs under Title II
7 follows the program wherever it is held. A public entity may not avoid its ADA
8 obligations by relocating a program to a third-party venue that fails to meet ADA
9 accessibility requirements. The ADA Title II regulations make clear that a public
10 entity’s programs, services, and activities must be accessible regardless of whether
11 they are conducted in facilities owned or leased by the public entity or in facilities
12 owned or operated by third parties. 28 C.F.R. §§ 35.130; 35.149; *see also* 28 C.F.R.
13 § 35.150. When a public entity selects a third-party venue to host a public program,
14 the public entity assumes responsibility for ensuring that the venue meets ADA
15 standards with respect to that program. The Irvine Bowl, which is publicly owned
16 but operated by a private lessor, is being used by Defendant to host an official, school-
17 sponsored public event—the graduation ceremony of Laguna Beach High School—
18 and is therefore subject to the full requirements of Title II of the ADA for purposes
19 of that event. Defendant cannot delegate or transfer its ADA compliance obligations
20 to the owner or operator of the Irvine Bowl, and the private status of the venue
21 operator does not diminish or extinguish Defendant’s duty to ensure equal access for
22 persons with disabilities.

23 35. By relocating the graduation ceremony from a fully accessible location
24 (Guyer Field at the High School) to the Irvine Bowl—a venue that provides only
25 eleven (11) wheelchair-accessible spaces and twelve (12) companion seats for an
26 anticipated attendance of *at least* 800 invited guests (not taking into account the
27 attending graduates themselves, faculty, and administrators), that features steep and
28 inaccessible approaches and interior circulation routes, and that clusters the

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1 designated accessible spaces in non-integrated locations in violation of applicable
2 disability standards—Defendant is effectively excluding Plaintiffs from participation
3 in the graduation ceremony and denying them a benefit equal to that afforded others
4 by reason of their disabilities in violation of the ADA. 28 C.F.R. § 35.130(b).

5 36. Defendant's failure to ensure that the graduation ceremony is held at an
6 accessible venue, and its refusal to hold the ceremony at a venue where adequate
7 accessibility exists, constitutes discrimination against Plaintiffs on the basis of
8 disability in violation of 42 U.S.C. § 12132 and 28 C.F.R. §§ 35.130, 35.149, 35.150.

9 37. Defendant's violation of Title II will cause Plaintiffs immediate,
10 concrete, and irreparable harm in the absence of injunctive relief. The loss of the right
11 to attend a family member's graduation ceremony—a singular, non-recurring life
12 event—constitutes irreparable harm for which there is no adequate remedy at law.

13 38. Defendant cannot demonstrate that maintaining the graduation ceremony
14 at the Irvine Bowl is necessary or justified, as it retains the option of maintaining the
15 status quo by holding the ceremony at the High School venue, a fully ADA-compliant
16 location where the graduation has been held for at least the past five (5) consecutive
17 years.

18 39. Moreover, on or about May 7, 2026, during a Parent Teacher Association
19 Council meeting, Superintendent Dr. Glass openly admitted that Defendant would be
20 “easily” able to relocate the graduation ceremony to an ADA-compliant venue if
21 enjoined (even at the eleventh hour) from holding the graduation ceremony at the
22 Irvine Bowl. Prohibiting Defendant from proceeding with the Irvine Bowl venue by
23 maintaining the status quo (the graduation ceremony at Guyer Field) imposes no
24 undue burden upon Defendant.

25 40. The balance of hardships tips decisively in Plaintiffs' favor. Defendant
26 suffers no cognizable hardship from being required to hold graduation at an ADA-
27 compliant venue. Plaintiffs, by contrast, face complete exclusion from a milestone
28 life event.

1 41. An injunction is in the public interest. The ADA reflects a strong federal
2 policy of ensuring that persons with disabilities have equal access to public programs
3 and services. Enforcement of the ADA's requirements serves the public interest.
4

5 **SECOND CLAIM FOR RELIEF**

6 **Violation of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794**

7 42. Plaintiffs incorporate by reference all preceding paragraphs as though
8 fully set forth herein.

9 43. Section 504 of the Rehabilitation Act of 1973 provides that no otherwise
10 qualified individual with a disability shall, solely by reason of her or his disability, be
11 excluded from the participation in, be denied the benefits of, or be subjected to
12 discrimination under any program or activity receiving Federal financial assistance.
13 29 U.S.C. § 794(a).

14 44. Defendant is a recipient of federal financial assistance within the
15 meaning of 29 U.S.C. § 794(b), including federal funds administered through the
16 United States Department of Education. As a recipient of such assistance, Defendant
17 is subject to the requirements of Section 504 with respect to all of its programs and
18 activities.

19 45. Each Plaintiff is an otherwise qualified individual with a disability within
20 the meaning of 29 U.S.C. § 705(20) and 34 C.F.R. § 104.3(k). Each Plaintiff has a
21 physical impairment—specifically, a mobility disability requiring use of a mobility-
22 assistance device—that substantially limits one or more major life activities including
23 walking, or is associated with such a person.

24 46. The graduation ceremony constitutes a program or activity of Defendant
25 within the meaning of 29 U.S.C. § 794(b), as it is a school-sponsored event organized,
26 administered, and conducted by a recipient of federal financial assistance. Section
27 504 imposes on Defendant an affirmative obligation to ensure that its programs and
28 activities are accessible to qualified individuals with disabilities, and prohibits

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1 Defendant from administering such programs in a manner that subjects persons with
2 disabilities to discrimination. 34 C.F.R. §§ 104.4, 104.21.

3 47. By changing the status quo in relocating the graduation ceremony to the
4 Irvine Bowl—a venue that provides only eleven (11) wheelchair-accessible spaces
5 and twelve (12) companion seats for an anticipated attendance of well over 800
6 guests, that features steep and inaccessible approaches and interior circulation routes,
7 and that clusters the designated accessible spaces in non-integrated locations in
8 violation of applicable standards—Defendant is excluding Plaintiffs from
9 participation in, and denying them the benefits of, the graduation program solely by
10 reason of their disabilities, in violation of Section 504 and its implementing
11 regulations. 34 C.F.R. §§ 104.4(b), 104.21, 104.22.

12 48. Defendant’s violation of Section 504 will cause Plaintiffs immediate,
13 concrete, and irreparable harm. The loss of the opportunity to attend a family
14 member’s once-in-a-lifetime graduation ceremony constitutes irreparable harm for
15 which there is no adequate remedy at law. This Court has jurisdiction to grant
16 declaratory and injunctive relief to remedy Defendant’s violations of Section 504
17 pursuant to 28 U.S.C. §§ 1331, 2201–2202, and the equitable powers of this Court.

18
19 **THIRD CLAIM FOR RELIEF**

20 **Violation of Cal. Gov’t Code § 11135**

21 49. Plaintiffs incorporate by reference all preceding paragraphs as though
22 fully set forth herein.

23 50. Cal. Gov’t Code § 11135 provides that no person in the State of
24 California shall, on the basis of disability, be unlawfully denied full and equal access
25 to the benefits of, or be unlawfully subjected to discrimination under, any program or
26 activity that is conducted, operated, or administered by the state or by any state
27 agency, is funded directly by the state, or receives financial assistance from the state.

28 51. Defendant is a public school system and is therefore a covered entity

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1 under Cal. Gov’t Code § 11135. Cal. Code Regs. tit. 2, § 14020(m)(5).

2 52. Each Plaintiff is an individual with a disability within the meaning of
3 Cal. Gov’t Code §§ 11135 and 12926(m). Each Plaintiff has a physiological
4 condition—specifically, a mobility disability requiring use of a mobility-assistance
5 device—that affects one or more body systems and limits one or more major life
6 activities, or is associated with such a person.

7 53. The graduation ceremony constitutes a program or activity of Defendant
8 within the meaning of Cal. Gov’t Code § 11135, as it is a school-sponsored event
9 organized, administered, and conducted by a public school system. Cal. Code Regs.
10 tit. 2, § 14020(ii). Cal. Gov’t Code § 11135 imposes on Defendant an affirmative
11 obligation to ensure that its programs and activities are accessible to qualified
12 individuals with disabilities, and prohibits Defendant from administering such
13 programs in a manner that subjects persons with disabilities to discrimination. Cal.
14 Code Regs. tit. 2, §§ 14326, 14332, 14335.

15 54. By relocating the graduation ceremony to the Irvine Bowl—a venue that
16 provides only eleven (11) wheelchair-accessible spaces and twelve (12) companion
17 seats for an anticipated attendance of 800 to 1,000 persons, that features steep and
18 inaccessible approaches and interior circulation routes, and that clusters the
19 designated accessible spaces in non-integrated locations in violation of applicable
20 standards—Defendant is excluding Plaintiffs from participation in, and denying them
21 the benefits of, the graduation program on the basis of their disabilities, in violation
22 of Cal. Gov’t Code § 11135 and its implementing regulations. Cal. Code Regs. tit. 2,
23 §§ 14326, 14332, 14335, 14342; *see also* Cal. Building Code §§ 11B-221.

24 55. Defendant’s violation of Cal. Gov’t Code § 11135 will cause Plaintiffs
25 immediate, concrete, and irreparable harm. The loss of the opportunity to attend a
26 family member’s once-in-a-lifetime graduation ceremony constitutes irreparable
27 harm for which there is no adequate remedy at law. This Court has jurisdiction to
28 grant declaratory and injunctive relief to remedy Defendant’s violations of Cal. Gov’t

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1 Code § 11135 pursuant to 28 U.S.C. §§ 1367, 2201–2202, and the equitable powers
2 of this Court.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in
5 their favor and against Defendant LAGUNA BEACH UNIFIED SCHOOL
6 DISTRICT, and grant the following relief:

7 A. A declaration pursuant to 28 U.S.C. §§ 2201–2202 that Defendant's
8 relocation of the graduation ceremony to the Irvine Bowl violates Title II of the
9 Americans with Disabilities Act, 42 U.S.C. § 12132, Section 504 of the Rehabilitation
10 Act of 1973, 29 U.S.C. § 794, and Cal. Gov't Code § 11135 because the Irvine Bowl
11 fails to provide mobility-device-accessible and companion seating sufficient to
12 accommodate persons with mobility disabilities in a manner equal to that provided to
13 non-disabled attendees, and because the venue's steep approach routes and interior
14 grade render it physically inaccessible to persons with mobility impairments;

15 B. A temporary restraining order, preliminary injunction, and permanent
16 injunction prohibiting Defendant, its officers, agents, servants, employees, and all
17 persons acting in concert or participation with Defendant, from holding the high
18 school graduation ceremony scheduled for June 11, 2026, or any continuation or
19 rescheduling thereof, at the Irvine Bowl;

20 C. An award of reasonable attorneys' fees and costs of suit pursuant to 42
21 U.S.C. § 12205 and 29 U.S.C. § 794a(b); and

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

23 Dated: June 2, 2026

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24
25
26 By: /s/ James S. Azadian
27 JAMES S. AZADIAN
28 CHRISTINE A. MARDIKIAN
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