

October 10, 2019

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**Via Email**

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**Re: Dona Dugo v. Bay Bridge Inn (CGC-19-576311)**

Mr. Manning:

Thank you for lowering your demand to \$4,000 in response to our letter and negotiations. You cited case law in support of our client paying Manning Law's fees. But, our client is confused about how your client will be the **prevailing** party. Maybe you are asserting that even if BBI has a compliant website, our client may not be entitled to attorney's fees. A result that we rectify forthwith. The compelling evidence and analysis clearly show that BBI's website was compliant with the ADA Law (28 C.F.R. §36.302(e)). Nevertheless, to resolve this matter and without admitting any wrongdoing, attached to this letter is an offer under CCP §998 for \$0.00 to resolve this matter without any confidentiality limitations.

The letter dated October 4, 2019 shares evidence of compliance with the ADA Law and utilization of a software solution that is The Gold Standard for ADA Title III compliance and Web Accessibility conformity. INNstight is a recognized expert in the ADA Law and its online application and has implemented proprietary technologies to defend against these types of meritless suits. My client is willing to produce the data in discovery as needed and looks forward to it, unless you choose to dismiss your lawsuit.

**STOP AND THINK**

Although my client is prepared to set the legal precedence for an ADA compliant websites, we advise you to review at least the following points:

- a. My client and its Digital Marketing System provider, INNstight, will prove that it is the Gold Standard for ADA Title III online compliance and Web Accessibility standard conformity. Additionally, the INNstight platform and its experts have the metadata and subject matter expertise to dispel any allegations of violation with the ADA law while demonstrating your client's exposure to a variety of activities.
- b. Most importantly, we look forward to analyzing your client's pertinent data and metadata, including but not limited to, entire search history, browser history and cache,

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credit card transactions, mobile, and telephone records to substantiate your claims. INNsight has the data architecture in place to cross-examine your client's IP address and movements on the BBI site and elsewhere to validate or invalidate your client's claims.

- c. Currently, you can exploit the lack of clarity of the application of the online ADA Law, but with this case, we aim to get much-needed clarity to the ADA Law from the court and thereby offer clarity to all other hoteliers.

We demand that you dismiss this case with prejudice, immediately. Otherwise, we are prepared to fight your claims to the very end and ensure that our cross-examination and evidentiary gathering methodology is ready to meet the challenge. If you would like to continue down this path, please preserve all evidence according to the letter dated October 4, 2019.

INNsight.com, Inc. continues to support BBI in its efforts relating to this case. We look forward to hearing your client's response to our offer.

Sincerely,

/s/ Kumar Maheshwari

**Kumar Maheshwari**  
Managing Partner  
MAHESH LAW GROUP, PC