

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Goodlaxson, et al.

v.

Mayor and City Council of Baltimore

Case No: 1:21-cv-01454-JKB

This Document Relates to:

Goodlaxson, et al. v. Mayor and City Council of Baltimore

1:21-cv-01454-JKB

**NOTICE OF INTENT TO ASSERT CLAIM PURSUANT TO PROPOSED
CLASS ACTION SETTLEMENT AGREEMENT IN GOODLAXSON, et al.
v. MAYOR AND CITY COUNCIL OF BALTIMORE**

Claimant San San Yu, by and through undersigned counsel, hereby notifies this Court of her intention to make a claim against the Consent Decree Settlement Agreement that has been reached in the above-captioned GOODLAXSON, et al. v. MAYOR AND CITY COUNCIL OF BALTIMORE case. Under the Agreement eligible claimants suffering from a disability are able to file a request with the City of Baltimore to improve the accessibility of certain pedestrian walkways and curb ramps. Petitioner's house is located adjacent to and directly within the pathway of a small alley located between a grocery store and an office building. This small alley is the result of a covenant that runs with the land and is promised of a pair of reciprocal covenants, one given from 3117 Saint Paul Street to 3121 and other from 3121 to 3109, a liquor Store. Together these two covenants form the 15-foot wide alley which is used daily by the public to travel by car or on foot from Saint Paul Street to Hargrove Alley.



Raymond Yu <raymond.yu.2@gmail.com>

Goodlaxson, et al. v. Mayor and City Council of Baltimore, Case Number 1:21-cv-01454-JKB

Gabriel Rubinstein <GabrielR@disabilityrightsmd.org>
To: Raymond Yu <raymond.yu.2@gmail.com>

Tue, Apr 15, 2025 at 11:58 AM

Hi Mr. Yu- just following up—I don't know enough exactly about the issue you're having and would need some more information before sending your email on to Ms. Dardarian or others/to determine what is appropriate. Let me know if your issue involves sidewalks or curb ramps and if there is an obstruction—if so, you can report to the City, see below.

Previous message: Hi Mr. Yu- Sending over a little more information, as I don't know enough about the situation you describe.

This lawsuit is aimed to help everyone with mobility disabilities who has had trouble using Baltimore's sidewalks, curb ramps, and pedestrian pathways because they were too steep, narrow, or damaged. I'm not sure if that is the issue you are describing:

Baltimore agrees to spend at least \$44 million to fix inaccessible sidewalks & curbs | Fox & Robertson

People with mobility disabilities can use the City's 3-1-1 system to report broken sidewalks or ramps. Baltimore City will:

- Investigate issues within 60 days.
- Provide a timeline for fixing the issue within 10 days after the investigation.
- Aim to fix the problem within nine months.
- Quickly respond to complaints about puddles forming on ramps.

From: Gabriel Rubinstein <GabrielR@disabilityrightsmd.org>

Sent: Tuesday, April 8, 2025 9:25 AM

To: Raymond Yu <raymond.yu.2@gmail.com>

[Quoted text hidden]

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ST. PAUL ST.

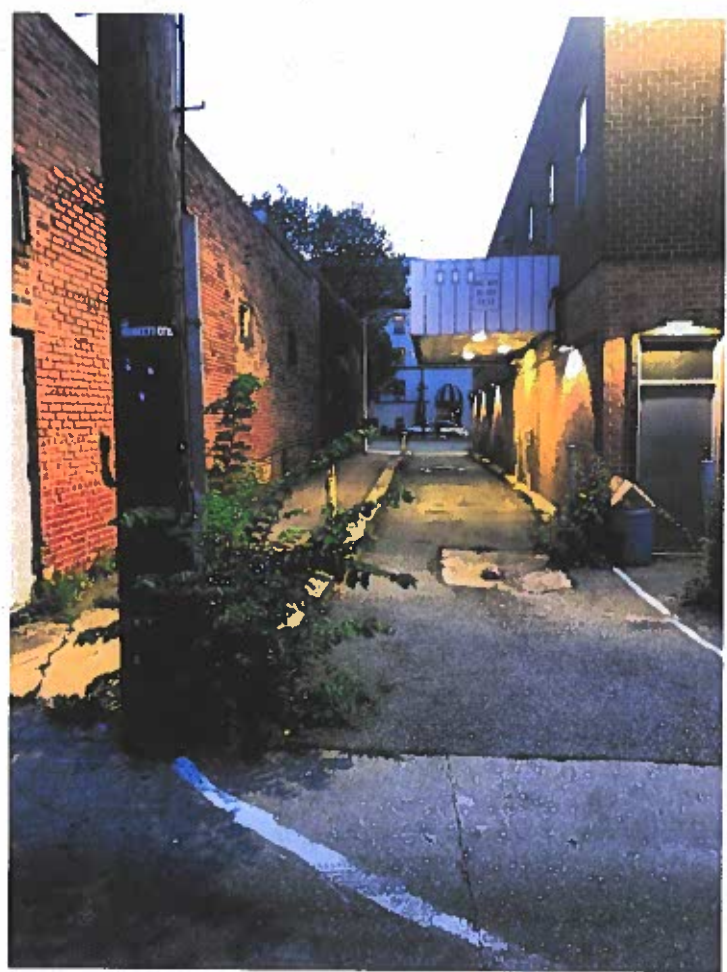
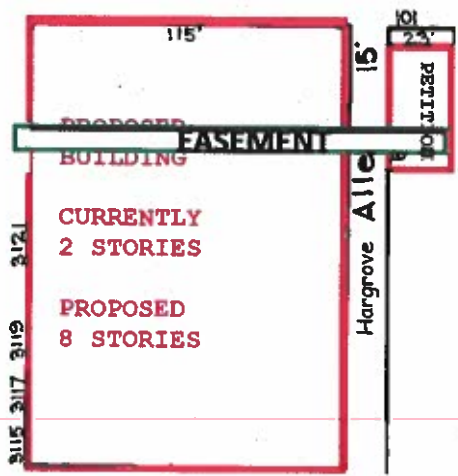
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E. 32ND

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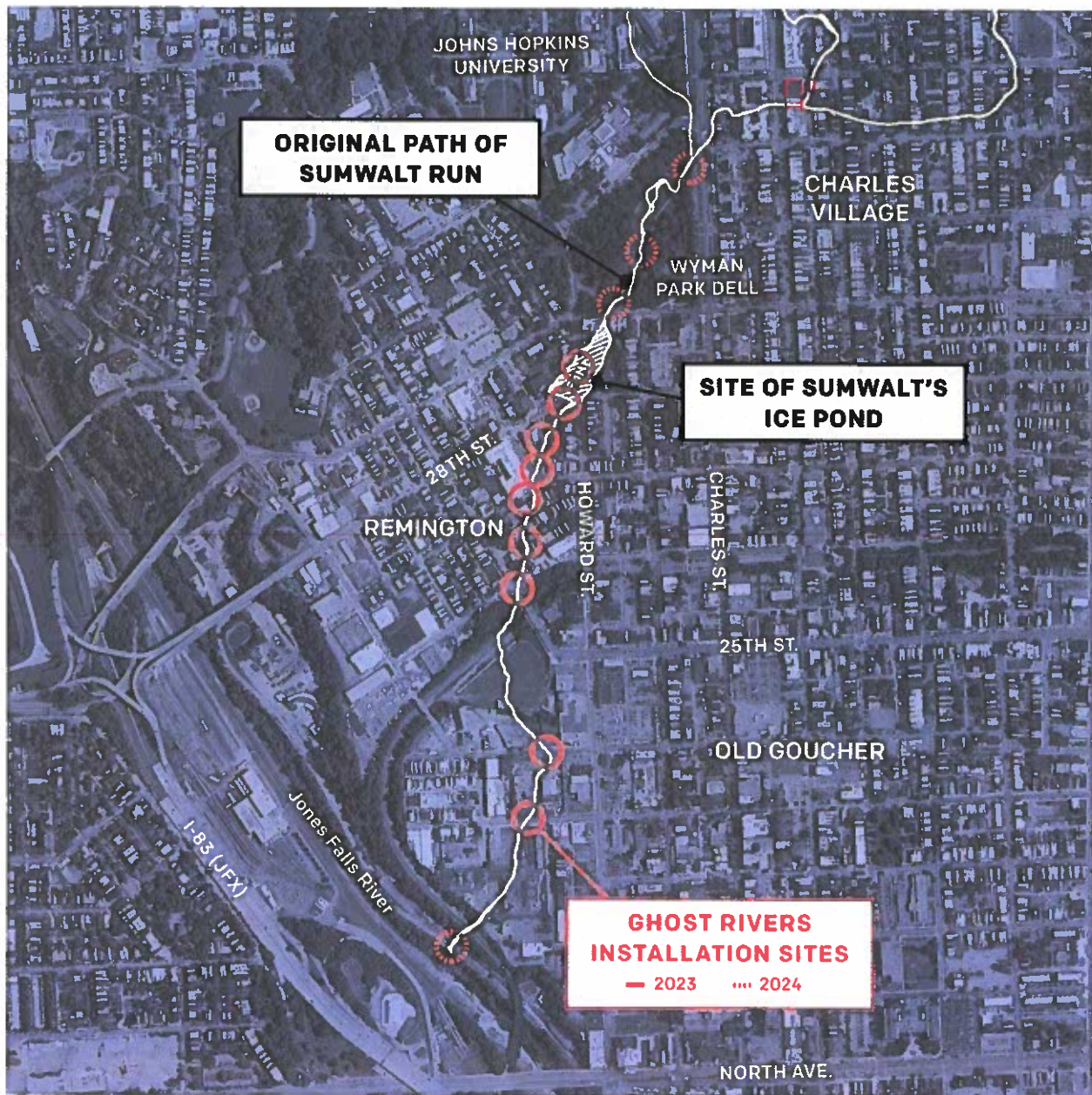
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N. CALVERT ST.



Plaintiff has been using this public street as the primary means of ingress and egress from her rear parking pad. However it is obvious that both the walkway and its adjacent drive-through lane has fallen into quite a level of disrepair.

Claimant also notes that the easement lies directly above an underground tributary called Sumwalt Creek. Though invisible from the surface Sumwalt Creek is an underground creek and therefore ill-suited in its present form to support or tolerate much demolition. This is of particular concern to Claimant since the entire western wall of her house lies adjacent to the pathway of this underground creek. Claimant's property and the adjacent proposed development are outlined in red at the very top right corner of the map. Both properties lie squarely on the pathway of the creek.



Claimant would like to invoke the New Construction and Alteration Obligations and Inspections requirement imposed upon the City of Baltimore by the Settlement Agreement, which just requires the city to maintain accessible curb ramps and pedestrian walkways and keep track of slopes, widths and any access barriers in the curb ramps or pedestrian walkways. The access ramp to the pedestrian walkway from the Hargrove Alley side is less than seven feet wide and obstructed by a transmission pole anchored at the corner of the walkway. Oftentimes

pedestrians traveling on foot are forced to walk on the drive-through lane but that becomes a hazardous endeavor in the winter since entire sections of that drive-through lane become covered in ice.

CONCLUSION

Plaintiff San San Yu wishes to make this Court aware of her intention to move forward under the terms of the above-captioned Settlement Agreement as it pertains to the easement adjacent to her property. Plaintiff has attached a copy of her submitted 311 report. Plaintiff will update this Court as soon as the work is completed.

Respectfully submitted,

/s/ Raymond Yu /s/

Raymond L. Yu (MD Bar No. 1802010007)
5715 Moreland Street NW
Washington, DC 20015
Telephone: (410) 467-5492
E-mail: raymondyu2@gmail.com
Counsel for Plaintiff San San Yu

PROOF OF SERVICE

I hereby certify that on July 7, 2025, a true and correct copy of the foregoing notice was served on all parties entitled to service electronically via the Federal Judiciary's CM/ECF system.

Dated: July 7, 2025

Respectfully Submitted,

/s/ Raymond Yu /s/
Raymond Yu
raymondyu2@gmail.com
5715 Moreland Street NW
Washington, DC 20015
Tel: (410) 467-5492

Counsel for Plaintiff San San Yu