

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO LAWYERS' COMMITTEE FOR	)	
CIVIL RIGHTS UNDER LAW, INC.	)	
	)	
Plaintiff	)	Judge Amy J. St. Eve
	)	
v.	)	Magistrate Judge Jeffrey Cole
	)	
CRAIGSLIST, INC.	)	Case No. 06 C 0657
	)	
Defendant.	)	

**ANSWER WITH AFFIRMATIVE DEFENSES**

Defendant craigslist, Inc. ("craigslist") for its answer to the Complaint for Monetary, Declaratory and Injunctive Relief (the "Complaint") of plaintiff Chicago Lawyers' Committee for Civil Rights Under Law, Inc. ("Plaintiff"), and for its Affirmative Defenses, states as follows:

**[NATURE OF THE CASE]**

1. This action seeks monetary, declaratory, and injunctive relief against Defendant craigslist, Inc., for publishing notices, statements, or advertisements with respect to the sale or rental of dwellings that indicate (1) a preference, limitation, or discrimination on the basis of race, color, religion, sex, familial status, or national origin; and (2) an intention to make a preference, limitation, or discrimination on the basis of race, color, religion, sex, familial status, or national origin. This action is brought pursuant to the federal Fair Housing Act, 42 U.S.C. § 3604(c).

**ANSWER:**

craigslist admits that Plaintiff purports to bring the action described in paragraph 1. craigslist affirmatively states that it is afforded immunity from Plaintiff's claim by 47 U.S.C. § 230(c). craigslist denies any remaining allegations of Paragraph 1.

**[JURISDICTION AND VENUE]**

2. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, in that the claims alleged herein arise under the laws of the United States, and 28 U.S.C. § 1332, in that Plaintiff and Defendant are citizens of different states, and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

**ANSWER:**

craigslist admits that Plaintiff and Defendant are citizens of different states. craigslist affirmatively states that other allegations of Paragraph 2 constitute conclusions of law as to which no response is required. craigslist further affirmatively states that it is afforded immunity from Plaintiff's claim by 47 U.S.C. § 230(c), and that this statute divests this Court of jurisdiction to adjudicate this action in any respect other than to determine that craigslist is immune from liability and the burdens of litigation in this action. craigslist denies any remaining allegations of Paragraph 2.

3. Venue is proper in the Northern District of Illinois under 28 U.S.C. § 1391 because the events or omissions giving rise to these claims occurred in this district, and Defendant conducts business in this district.

**ANSWER:**

craigslist does not contest the allegation that venue is proper for this action in this district. craigslist otherwise denies the allegations of Paragraph 3.

4. This Court has authority to grant declaratory and injunctive relief as well as compensatory and punitive damages pursuant to 42 U.S.C. §§ 3612(o)(3), 3613(c)(1), and 28 U.S.C. §§ 2201-2. The Court also has the authority to award reasonable attorneys' fees and costs to a prevailing party pursuant to 42 U.S.C. § 3613(c)(2).

**ANSWER:**

craigslist affirmatively states that Paragraph 4 asserts legal conclusions to which no answer is required. Craigslist nevertheless denies all of the allegations of Paragraph 4 to the extent that they assert or imply that there is any basis or authority for a grant of any relief to Plaintiff in this action.

**[PARTIES]**

5. Plaintiff Chicago Lawyers' Committee for Civil Rights Under Law, Inc. (CLC), is an Illinois non-profit organization with its principal place of business located at 100 North LaSalle Street, Suite 600, Chicago, Illinois 60602. The CLC's mission is to promote and protect civil rights, particularly the civil rights of the poor, ethnic minorities, and the disadvantaged.

The CLC strives to eliminate discriminatory housing practices by: (1) educating people about their rights under the fair housing and fair lending laws; (2) investigating complaints of fair housing discrimination; (3) providing referral information for non-discrimination housing matters; (4) advocating on a wide range of housing related issues, such as public housing, increased affordable housing, and fair and equal mortgage lending opportunities; and (5) providing free legal services to individuals and groups who wish to exercise their fair housing rights and secure equal housing opportunities.

**ANSWER:**

craigslist lacks knowledge or information sufficient to admit or deny the allegations of Paragraph 5, and on that basis denies these allegations.

6. Upon information and belief, Defendant craigslist, Inc., is a Delaware corporation located at 1381 9th Avenue, San Francisco, California 94122, and created in connection with online advertising of housing sale and rental opportunities.

**ANSWER:**

craigslist admits that it is a Delaware corporation with an office at 1381 9th Avenue, San Francisco, California 94122. craigslist denies any remaining allegations of Paragraph 6.

**[FACTS]**

**[A. Introduction]**

7. Defendant craigslist, Inc., operates a website accessible at "chicago.craigslist.org," which is titled "craigslist: chicago classifieds for jobs, apartments, personals, for sale, services, community," as a means of posting or advertising housing sale or rental opportunities. Defendant's website contains a website link titled "post to classifieds."

**ANSWER:**

craigslist admits that it operates a Web site that is accessible through various Web addresses, including "chicago.craigslist.org," and that a part of this Web site is identified in certain places as "craigslist: chicago classifieds for jobs, apartments, personals, for sale, services, community: Non-commercial bulletin board for events, jobs, housing, personal ads and community discussion." craigslist further admits that third-party users of this Web site use it to post and read notices for, among other things, housing sale or rental opportunities. craigslist

further admits that this Web site contains a link entitled "post to classifieds." craigslist denies any remaining allegations of Paragraph 7.

8. The website link titled "post to classifieds," opens a new webpage located at "post.craigslist.org/chi," titled "chicago craigslist posting." At this webpage, Defendant's website categorizes posts and advertisements and titles website links as the following: (1) "job"; (2) "gigs"; (3) "housing"; (4) "for sale / wanted"; (5) "resume"; (6) "services offered"; (7) "personal / romance"; (8) "community"; and (9) "event." This webpage also contains website links titled "log in to your account," and "Apply for Account."

**ANSWER:**

craigslist admits that when a user accesses the craigslist Web site via the "chicago.craigslist.org" address and then "clicks" on the "post to classifieds" link, the Web site will display a page located at "post.craigslist.org/chi." craigslist affirmatively states that this page bears a title of "chicago craigslist >> create posting." craigslist further affirmatively states that this page has a line reading "what type of posting is this:". craigslist admits this page has nine links labeled as indicated in the second sentence of Paragraph 8 as well as additional links labeled "log in to you account" and "(Apply for Account)". craigslist denies any remaining allegations of Paragraph 8.<sup>1</sup>

9. The website link titled "housing," opens a new webpage located at "post.craigslist.org/chi/H," titled "chicago craigslist posting > housing." At this webpage, Defendant's website categorizes posts and advertisements and titles website links as the following: (1) "I am offering housing"; and (2) "I need housing." This webpage also contains website links titled "log in to your account" and "Apply for Account."

**ANSWER:**

craigslist admits that when a user of the Web site "clicks" on the Web site link "housing" that appears on the page entitled "chicago craigslist >>create posting," the Web site will display

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<sup>1</sup> craigslist affirmatively states that all of its averments in this pleading regarding the functionality of the craigslist Web site describe the manner in which the site routinely functioned as of February 3, 2006, the date on which Plaintiff filed its Complaint.

a page located at "post.craigslist.org/chi/H." craigslist affirmatively states that this Web page bears a title of "chicago craigslist > housing > create posting." craigslist also affirmatively states that this Web page displays (in highlighted text) that "Stating a discriminatory preference in a housing post is illegal, and prohibited on craigslist." craigslist further affirmatively states that this Web page has a line reading "Are you offering space/housing, or do you need space/housing?" (Emphasis omitted.) craigslist admits that on this Web page, immediately under the above quoted text, there are two links labeled "I am offering housing" and "I need housing" as well as two other links (at the upper right of the page) labeled "log in to you account" and "(Apply for Account)". craigslist denies any remaining allegations of Paragraph 9.

10. The website link titled "I am offering housing," opens a new webpage located at "post.craigslist.org/chi/H?want=n," also titled "chicago craigslist posting > housing." At this webpage, Defendant's website states that an "ad will expire in 7 days." Additionally, Defendant's website categorizes posts and advertisements and titles website links as the following: (1) "rooms & shares"; (2) "apartments for rent"; (3) "housing swap"; (4) "office & commercial"; (5) "parking & storage"; (6) "real estate for sale"; (7) "sublets & temporary"; and (8) "vacation rentals." Accessing any of these website links opens a new webpage making available suggested and "[r]equired" fields which comprise the content of the post or advertisement. These content fields list rent or price, specific and general location, the title of the advertisement, a contact email address, and a description with the capability to add pictures. Moreover, the webpage lists the option to "anonymize[]" a contact email address with a newly-assigned and unique email address using the domain name "craigslist.org." This webpage also contains website links titled "log in to your account," and "Apply for Account."

**ANSWER:**

craigslist admits that when user of the Web site who "clicks" on the link "I am offering housing" referred to in craigslist's Answer to Paragraph 9, the Web site will display a page located at "post.craigslist.org/chi/H?want=." craigslist affirmatively states that this Web page bears a title of "chicago craigslist > housing > create posting." craigslist also affirmatively states that this Web page displays (in highlighted text) that "Stating a discriminatory preference in a housing post is illegal, and prohibited on craigslist." craigslist further affirmatively states that this Web page has a line reading "Your ad will expire in 7 days. Please choose a category:".

craigslist admits that the Web page, immediately under the above-quoted text, has eight links labeled as indicated in the third sentence of Paragraph 10, as well as two other links (at the upper right of the page) labeled "log in to you account" and "(Apply for Account)". craigslist admits that if a user clicks on any of the eight aforementioned links, the Web site will display a Web page containing an electronic form with various fields in which users may enter information so as to create the content of a posting. craigslist further admits that three of the fields on this form ("Posting Title," "Posting Description," and "Your Email address") are "[r]equired" in the sense that a user cannot successfully create a posting without entering information into each of these fields. craigslist further admits that other fields on the form include, among others, areas for users to enter rent or price information and specific location, and that the form allows for the capability for users to add pictures. craigslist further admits that the Web page offers users an option (instead of using a pre-existing email address) to "anonymize[]" a contact email address with a newly-assigned and unique email address using the domain name "craigslist.org." craigslist denies any remaining allegations of Paragraph 10.

11. The website link titled "I need housing," opens a new webpage located at "post.craigslist.org/chi/H?want=y," also titled "chicago craigslist posting > housing." At this webpage, Defendant's website states that an "ad will expire in 7 days." In addition, Defendant's website categorizes posts and advertisements and titles website links as the following: (1) "apts wanted"; (2) "real estate wanted"; (3) "room/share wanted"; and (4) "sublet/temp wanted." Accessing any of these website links opens a new webpage making available suggested and "[r]equired" fields that comprise the content of the post or advertisement. The content fields list rent or price, specific and general location, the title of the advertisement, a contact email address, and a description with the capability to add pictures. Further, the webpage lists the option to "anonymize[]" a contact email address with a newly-assigned and unique email address using the domain name "craigslist.org." This webpage also contains website links titled "log in to your account," and "Apply for Account."

**ANSWER:**

craigslist admits that when a user of the Web site "clicks" on the link "I need housing" referred to in craigslist's Answer to Paragraph 9, the Web site will display a page located at

"post.craigslist.org/chi/H?want=y." craigslist affirmatively states that this Web page bears a title of "chicago craigslist > housing > create posting." craigslist also affirmatively states that this Web page displays (in highlighted text) that "Stating a discriminatory preference in a housing post is illegal, and prohibited on craigslist." craigslist further affirmatively states that this Web page has a line reading "Your ad will expire in 7 days. Please choose a category:". craigslist admits that the Web page, immediately under the above-quoted text, has four links labeled as indicated in the third sentence of Paragraph 11, as well as two other links (at the upper right of the page) labeled "log in to you account" and "(Apply for Account)". craigslist admits that if a user clicks on any of the four aforementioned links, the Web site will display a Web page containing an electronic form with various fields in which the user may enter information so as to create the content of a posting. craigslist further admits that three of the fields on this form ("Posting Title," "Posting Description," and "Your Email address") are "[r]equired" in the sense that a user cannot successfully create a posting without entering information into each of these fields. craigslist further admits that other fields on the form include, among others, areas for users to enter rent or price information and specific location, and that the form has the capability for the user to add pictures. craigslist further admits that the Web page offers users an option to "anonymize[]" a contact email address with a newly-assigned and unique email address using the domain name "craigslist.org." craigslist denies any remaining allegations of Paragraph 11.

12. The website link titled "log in to your account," opens a new webpage located at either "accounts.craigslist.org/login?rt=P&rp=/chi," "accounts.craigslist.org/login?rt=P&rp=/chi/H?want=y," or "accounts.craigslist.org/login?rt=P&rp=/chi/H?want=n," titled "craigslist: account log in," that lists an "Email / Handle" field and a "Password" field so that those with "craigslist accounts" may access saved prior content and information. The webpage also lists an "accounts@craigslist.org" email address so individuals may seek account assistance from Defendant's employees if necessary.



**ANSWER:**

craigslist admits that when a user of the Web site "clicks" on any of the "log in to your account" links referred to in craigslist's Answers to Paragraphs 8 through 11, the Website will display a page that has an address beginning with "accounts.craigslist.org/login?rt=P&rp=/chi" and a title of "craigslist: Account Log In." craigslist affirmatively states that this page displays a sign-in form with two open fields, one for "Email/Handle" and the other for "Password." craigslist affirmatively states that its standard, sign-in process permits users of the Web site to access their personal accounts, which allows them to access prior postings, responses to such postings, and other information. craigslist also affirmatively states that the sign-in page has a line that reads "need help?" followed by a link that enables a user to send an email to the email address "accounts@craigslist.org". craigslist denies any remaining allegations of Paragraph 12.

13. The website link titled "Apply for Account," opens a new webpage located at "accounts.craigslist.org/login/signup," titled "craigslist: account signup," that directs individuals to type a five-letter verification word, provide a contact email address, and click on a button to "create account" so that prior content and information may be saved and accessed later.

**ANSWER:**

craigslist admits that when a user of the Web site "clicks" on any of the "(Apply for Account)" links referred to in craigslist's Answers to Paragraphs 8 through 11, the Web site will display a page located at "accounts.craigslist.org/login/signup" that has a title of "craigslist: account signup." craigslist affirmatively states that this page displays a randomly selected five letter "verification word" and has two open fields, asking users who wish to open accounts to retype the five letter "word" and to enter an email address. craigslist affirmatively states that users who complete these two fields, may then "click" on a "button" labeled "create account," to continue the account-opening process. craigslist denies any remaining allegations of Paragraph 13.



14. When home-seekers are interested in sale or rental housing opportunities advertised on Defendant's website, the necessary contact information is obtained from content published on Defendant's website.

**ANSWER:**

craigslist affirmatively states that users of its Web site who are interested in sale or rental housing opportunities described in third-party postings available through the craigslist Web site may obtain certain "contact information" from the content included in such postings. craigslist denies any remaining allegations of Paragraph 14.

15. Upon information and belief, Defendant craigslist, Inc., has previously been sued for publishing discriminatory housing advertisements on its website without endeavoring to prevent such advertisements. Defendant settled those cases. Defendant is thus fully aware of its obligations under the Fair Housing Act.

**ANSWER:**

craigslist denies the allegations of Paragraph 15.

**[B. Discriminatory Housing Advertisements Published on Defendant's Website]**

**[1. Discriminatory Advertisements on the Basis of Race]**

16. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of race. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the basis of race. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or

information sufficient to admit or deny any of the remaining allegations of Paragraph 16, and on that basis denies all such allegations.

17. At least on July 6, 2005, Defendant's website published a rental advertisement containing the statement "African Americans and Arabians tend to clash with me so that won't work out."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 17, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 17, and on that basis denies those allegations.

18. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Neighborhood is predominantly Caucasian, Polish and Hispanic."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 18, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 18, and on that basis denies those allegations.

19. At least on January 12, 2006, Defendant's website published a rental advertisement containing the statement "NO MINORITIES."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 19, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 19, and on that basis denies those allegations.

**[2. Discriminatory Advertisements on the Basis of Color]**

20. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of color. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the basis of color. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 20, and on that basis denies all such allegations.

21. At least on July 29, 2005, Defendant's website published a housing advertisement containing the statement "Non-Women of Color NEED NOT APPLY."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 21, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be

treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 21, and on that basis denies those allegations.

**[3. Discriminatory Advertisements on the Basis of National Origin]**

22. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of national origin. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the basis of national origin. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 22, and on that basis denies all such allegations.

23. At least on July 6, 2005, Defendant's website published a rental advertisement containing the statement "African Americans and Arabians tend to clash with me so that won't work out."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 23, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 23, and on that basis denies those allegations.

24. At least on July 15, 2005, Defendant's website published a housing advertisement containing the statement "looking for gay latino."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 24, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 24, and on that basis denies those allegations.

25. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Neighborhood is predominantly Caucasian, Polish and Hispanic."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 25, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 25, and on that basis denies those allegations.

26. At least on August 3, 2005, Defendant's website published a rental advertisement containing the statement "This is not in a trendy neighborhood - very Latino."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 26, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 26, and on that basis denies those allegations.

27. At least on September 1, 2005, Defendant's website published a rental advertisement containing the statement "The neighborhood is probably what you've heard...predominantly hispanic, but changing slowly."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 27, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 27, and on that basis denies those allegations.

28. At least on September 6, 2005, Defendant's website published a rental advertisement containing the statement "All in a vibrant southwest Hispanic neighborhood offering great classical Mexican culture, restaurants and businesses."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 28, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 28, and on that basis denies those allegations.

**[4. Discriminatory Advertisements on the Basis of Sex]**

29. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of sex. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the basis of sex. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 29, and on that basis denies all such allegations.

30. At least on July 13, 2005, Defendant's website published a rental advertisement containing the statement "Requirements: Clean Godly Christian Male."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 30, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 30, and on that basis denies those allegations.

31. At least on August 16, 2005, Defendant's website published a sublet advertisement containing the statement "This is what I am looking for ... and the more a candidate has, the less I will ask in rent: Female Christian."



**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 31, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 31, and on that basis denies those allegations.

32. At least on August 17, 2005, Defendant's website published a housing advertisement containing the statement "Christian single straight female needed."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 32, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 32, and on that basis denies those allegations.

33. At least on September 1, 2005, Defendant's website published a rental advertisement containing the statement "Owner lives on the first floor, so tenant must be respectful of the situation, preferably not 2 guys in their mid twenties who throw parties all the time."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 33, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 33, and on that basis denies those allegations.

34. At least on January 16, 2006, Defendant's website published a rental advertisement containing the statement "LADIES PLEASE RENT FROM ME."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 34, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 34, and on that basis denies those allegations.

**[5. Discriminatory Advertisements on the Basis of Religion]**

35. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of religion. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the basis of religion. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or

information sufficient to admit or deny any of the remaining allegations of Paragraph 35, and on that basis denies all such allegations.

36. At least on July 13, 2005, Defendant's website published a rental advertisement containing the statement "Requirements: Clean Godly Christian Male."

**ANSWER:**

craigslist affirmatively that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 36, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 36, and on that basis denies those allegations.

37. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "The neighborhood is Orthodox Jewish for the most part with temples close by."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 37, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 37, and on that basis denies those allegations.

38. At least on August 16, 2005, Defendant's website published a sublet advertisement containing the statement "This is what I am looking for ... and the more a candidate has, the less I will ask in rent: Female Christian."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 38, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 38, and on that basis denies those allegations.

39. At least on August 17, 2005, Defendant's website published a housing advertisement containing the statement "Christian single straight female needed."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 39, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 39, and on that basis denies those allegations.

40. At least on August 19, 2005, Defendant's website published a rental advertisement containing the statement "Only Muslims apply."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 40, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 40, and on that basis denies those allegations.

41. At least on August 23, 2005, Defendant's website published a rental advertisement containing the statement "near St Gertrudes church."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 41, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 41, and on that basis denies those allegations.

42. At least on August 29, 2005, Defendant's website published a rental advertisement containing the statement "Great for 2- couples . . . . temple next door."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 42, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 42, and on that basis denies those allegations.

43. At least on September 1, 2005, Defendant's website published a rental advertisement containing the statement "Walk to shopping, restaurants, coffee shops, synagogue."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 43, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 43, and on that basis denies those allegations.

44. At least on September 6, 2005, Defendant's website published a housing advertisement containing the statement "Muslim preferred."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 44, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 44, and on that basis denies those allegations.

45. At least on September 6, 2005, Defendant's website published a rental advertisement containing the statement "Near transp., shopping, church."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 45, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 45, and on that basis denies those allegations.

46. At least on September 8, 2005, Defendant's website published a rental advertisement containing the statement "temple next door."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 46, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 46, and on that basis denies those allegations.

47. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "The entire building is filled with interesting and fun people. Mostly Loyola Students....Church immediately across from building."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 47, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 47, and on that basis denies those allegations.

48. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "very quiet street opposite church."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 48, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 48, and on that basis denies those allegations.

49. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "Within walking distance to transportation, shopping, church."



**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 49, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 49, and on that basis denies those allegations.

50. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "Accesible to transportation, church ST Margareth."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 50, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 50, and on that basis denies those allegations.

51. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "Great for a family, great for adult acting roommates..... perfect for family or roommates St. bens Catholic Church is one block away."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 51, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 51, and on that basis denies those allegations.

52. At least on September 23, 2005, Defendant's website published a rental advertisement containing the statement "Across from the Catholic Church."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 52, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 52, and on that basis denies those allegations.

53. At least on September 29, 2005, Defendant's website published a rental advertisement containing the statement "ACROSS FROM ST MARY'S CHURCH."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 53, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 53, and on that basis denies those allegations.

54. At least on October 25, 2005, Defendant's website published a rental advertisement containing the statement "Catholic Church, and beautiful Buddhist Temple within one block."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 54, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 54, and on that basis denies those allegations.

55. At least on October 25, 2005, Defendant's website published a rental advertisement containing the statement "Christian owners. Students, families welcome."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 55, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 55, and on that basis denies those allegations.

56. At least on October 25, 2005, Defendant's website published a rental advertisement containing the statement "The house is perfect for a family and there is a church right across the street."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 56, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 56, and on that basis denies those allegations.

57. At least on October 25, 2005, Defendant's website published a rental advertisement containing the statement "next to St. Gregory's church."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 57, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 57, and on that basis denies those allegations.

58. At least on October 25, 2005, Defendant's website published a rental advertisement containing the statement "Walk to shopping, restaurants, coffee shops, synagogue."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 58, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 58, and on that basis denies those allegations.

**[6. Discriminatory Advertisements on the Basis of Familial Status]**

59. Defendant publishes housing advertisements on its website that indicate a preference, limitation, or discrimination, or an intention to make a preference, limitation, or discrimination, on the basis of familial status. Such advertisements discourage or prohibit home-seekers from responding to those advertisements and thus decrease the number of units available to them.

**ANSWER:**

craigslist affirmatively states that third-party users of its Web site have posted many millions of housing notices on its Web site and that in the past it is possible that a small number of such notices may have used language that might indicate a preference or limitation on the

basis of familial status. craigslist denies that it published, and further denies that it may be treated as having published, any such notices or advertisements. craigslist further affirmatively states that, pursuant to 47 U.S.C. § 230(c), it is immune from liability and the burdens of litigation with respect to the alleged "publication" of any such third-party notices. craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 59, and on that basis denies all such allegations.

60. At least on July 20, 2005, Defendant's website published a rental advertisement containing the statement "Apt. too small for families with small children."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 60, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 60, and on that basis denies those allegations.

61. At least on July 20, 2005, Defendant's website published a rental advertisement containing the statement "Perfect for 4 Med students."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 61, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 61, and on that basis denies those allegations.

62. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Perfect for young couples and students with or without transportation."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 62, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 62, and on that basis denies those allegations.

63. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Perfect place for city single."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 63, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 63, and on that basis denies those allegations.

64. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Great for students, young professionals or a couple w/ pets."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 64, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 64, and on that basis denies those allegations.

65. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Suitable for single person preferable."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 65, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 65, and on that basis denies those allegations.

66. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Are you a single person who needs to live near public transportation."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 66, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 66, and on that basis denies those allegations.

67. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "absolutely ideal for a young professional and socialite!"

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 67, especially based on the little information Plaintiff has



averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 67, and on that basis denies those allegations.

68. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Great apartment for medical students, grad students, and young professionals."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 68, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 68, and on that basis denies those allegations.

69. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Perfect for young couples."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 69, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 69, and on that basis denies those allegations.

70. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "adults preferred."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 70, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 70, and on that basis denies those allegations.

71. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Ideal for roommates or single person. Sorry, no kids, no pets."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 71, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 71, and on that basis denies those allegations.

72. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "Great for students or single adult(s)."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 72, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 72, and on that basis denies those allegations.

73. At least on July 21, 2005, Defendant's website published a rental advertisement containing the statement "great for a single young professional or a couple."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 73, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 73, and on that basis denies those allegations.

74. At least on July 25, 2005, Defendant's website published a sublet advertisement containing the statement "Apartment is situated on 8th floor of building teeming with young people. It is unfurnished but ideal for a student or young single professional."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 74, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 74, and on that basis denies those allegations.

75. At least on July 25, 2005, Defendant's website published a sublet advertisement containing the statement "the IDEAL location for a student or young professional."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 75, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge

or information sufficient to admit or deny any of the remaining allegations of Paragraph 75, and on that basis denies those allegations.

76. At least on July 25, 2005, Defendant's website published a sublet advertisement containing the statement "this is a place for a single person, very spacious for a single person, too small for a couple."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 76, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 76, and on that basis denies those allegations.

77. At least on July 26, 2005, Defendant's website published a rental advertisement containing the statement "Ideal for young person just starting out."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 77, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 77, and on that basis denies those allegations.

78. At least on July 28, 2005, Defendant's website published a rental advertisement containing the statement "Master Bedroom Huge with adjacent room for . . . baby."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 78, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 78, and on that basis denies those allegations.

79. At least on July 28, 2005, Defendant's website published a rental advertisement containing the statement "Perfect for Young Family Or 2 Broke ASS Roommates."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 79, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 79, and on that basis denies those allegations.

80. At least on August 1, 2005, Defendant's website published a sublet advertisement containing the statement "perfect for students and young professionals."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 80, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 80, and on that basis denies those allegations.

81. At least on August 1, 2005, Defendant's website published a rental advertisement containing the statement "young cool landlord who wants one nice quiet [sic] person to rent her basement."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 81, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 81, and on that basis denies those allegations.

82. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "Non-smoking adults preferred."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 82, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 82, and on that basis denies those allegations.

83. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "Prefer quiet one or two person household."

**ANSWER:**

craigslist affirmatively that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 83, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 83, and on that basis denies those allegations.

84. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "Preferred renter will be: Young couple with/out children Young couple with 1 or 2 children or Older couple."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 84, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 84, and on that basis denies those allegations.

85. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "available immediately to a mature individual."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 85, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 85, and on that basis denies those allegations.

86. At least on August 2, 2005, Defendant's website published a rental advertisement containing the statement "I will only allow single occupancy."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 86, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge



or information sufficient to admit or deny any of the remaining allegations of Paragraph 86, and on that basis denies those allegations.

87. At least on August 5, 2005, Defendant's website published a rental advertisement containing the statement "Pet and kid friendly. Grads or professionals preferred."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 87, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 87, and on that basis denies those allegations.

88. At least on August 11, 2005, Defendant's website published a rental advertisement containing the statement "Perfect college apartment or young single."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 88, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 88, and on that basis denies those allegations.

89. At least on August 11, 2005, Defendant's website published a rental advertisement containing the statement "I prefer to rent to other graduate students, especially students in the professional schools."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 89, especially based on the little information Plaintiff has

averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 89, and on that basis denies those allegations..

90. At least on August 12, 2005, Defendant's website published a rental advertisement containing the statement "Quiet building is home for a few young professionals & students."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 90, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 90, and on that basis denies those allegations.

91. At least on August 15, 2005, Defendant's website published a rental advertisement containing the statement "I will only allow single occupancy in the apartment."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 91, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 91, and on that basis denies those allegations.

92. At least on August 15, 2005, Defendant's website published a rental advertisement containing the statement "Great apartment for graduate students . . . , married couple, small family."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 92, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 92, and on that basis denies those allegations.

93. At least on August 15, 2005, Defendant's website published a rental advertisement containing the statement "Suitable for single individual only."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 93, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 93, and on that basis denies those allegations.

94. At least on August 18, 2005, Defendant's website published a rental advertisement containing the statement "Perfect for the single graduate student."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 94, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 94, and on that basis denies those allegations.

95. At least on August 18, 2005, Defendant's website published a rental advertisement containing the statement "terrific 16 unit young professional building."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 95, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 95, and on that basis denies those allegations.

96. At least on August 18, 2005, Defendant's website published a rental advertisement containing the statement "ADULTS PREFERRED."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 96, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge or information sufficient to admit or deny any of the remaining allegations of Paragraph 96, and on that basis denies those allegations.

97. At least on August 18, 2005, Defendant's website published a rental advertisement containing the statement "great social young professional's highrise."

**ANSWER:**

craigslist affirmatively states that it is overly burdensome to confirm the existence of the specific posting alleged in Paragraph 97, especially based on the little information Plaintiff has averred with respect to the alleged posting. craigslist denies that it published, or that it may be treated as having published, this alleged posting. In all other respects, craigslist lacks knowledge