

IN THE CIRCUIT COURT FOR BALTIMORE CITY

JEANNETTE BELLIVEAU,	*	
Plaintiff,	*	
vs.	*	Case No. 24-C-19-001836
AirBNB Inc.,	*	
Defendant.	*	

**APPELLANT’S REPLY TO APPELLEE’S OPPOSITION
TO AMENDED REQUEST TO AMEND**

JEANNETTE BELLIVEAU, Appellant, representing herself, hereby respectfully and briefly responds to two allegations included in the Appellee’s Opposition to the Appellant’s request for leave to amend; specifically, the allegations that (1) her amended complaint would include additional causes of action and (2) that such amendment is sought as an act of procedural gamesmanship, stating as follows:

1. Contrary to claims by the Appellee, there has been no change to her original cause of action. The Appellant was economically devastated by the Appellee’s negligent removal of her listings from the AirBNB platform in August 2018. The Appellant filed a straightforward tort complaint in November 2018. If permitted, the Appellant’s amended complaint would include additional damages that continue to accrue as a result of Appellee’s negligent conduct in connection with the Appellant’s de-listing.

2. Further, the Appellee’s Opposition mischaracterizes the Appellant’s goals in seeking her amendment. The Appellant, a pro se litigant, is not seeking tactical or mischievous legal advantages in her Request to Amend. She simply seeks to provide the continuing narrative of the significant financial straits -- quite possibly permanent and far more dire now than at the

tort filing in November -- of the Appellee's inexplicable, negligent and callous delisting of her short-term rental rooms.


3. The Appellant remains confident that the Court will be desirous of hearing the true and disconcerting facts of this case, which have been significantly distorted in the Appellee's Response.

RESPECTFULLY SUBMITTED,



JEANNETTE BELLIVEAU
203 South Ann St.
Baltimore, MD 21231
410-342-5131
amateursguide@gmail.com

I hereby certify under the penalty of perjury that the facts contained in the foregoing document are true and accurate to the best of my knowledge, information and belief.



JEANNETTE BELLIVEAU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Monday, May 6, 2019, a copy of the foregoing document was hand delivered to:

Spencer Evans, Esq.
Niles, Barton & Wilmer
111 S. Calvert St.
Suite 1400
Baltimore, MD 21202

Counsel for Defendant



JEANNETTE BELLIVEAU