

IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

Dwayne Morris, an individual)			
Plaintiff,))) (110.62	50		
Airbnb Inc., a California Corporation with its offices located in San Francisco, and John Doe an artitude of the california Corporation) CJ-19-62.) Honorable)	52 e Judge: Natalie Mai		
and John Doe, an entity operating under the name of Global Community Travel a Tennessee Corporation with its office)))	PILED IN DISTRICT LANGE OKLAHOMA COUNTY		
located in Nashville, Defendants.)	NOV 1 \$ 2019		
AMEN	DED PETITION	RICK WARREN COURT CLERK 48		

COME NOW, Plaintiff, Dwayne Morris, and pursuant to 12 O.S. §2015 amends his Petition as a matter of course before a responsive pleading is served and for his cause against the Defendants Airbnb Inc., Global Community Travel, (Hereinafter collectively referred to as "Defendants") state and allege as follows:

- 1. Plaintiff, Dwayne Morris is an individual for all times relevant residing in and within State of Oklahoma, County of Oklahoma.
- 2. Defendants Airbnb, Inc, Airbnb Payments, Airbnb Global Community, and Airbnb Adventures (individually or collectively, "Defendants") are Californian Corporations, located at 888 Brannan Street, San Francisco, California, 94103 doing business through internet throughout United States.
- 3. During the month of June 2019, Defendant advertised that it would offer six travelers spots in its Around the World in 80 Days "trip of a lifetime" game of chance offering. [Exhibit 1]
 - 4. Defendant publicized the offering in the State of Oklahoma, the United States, and



worldwide via Internet and other communication channels.

- 5. The Plaintiff was at all relevant times and remains a bonafide consumer eligible to accept and participate in the Defendant's offering.
- 6. At no time has the Defendant alleged that the Plaintiff was ineligible to enter and win the offering.
- 7. The dates and times of the game of chance offering were advertised to be June 20, 2019 at 2 pm Easter Daylight Time (1 pm CST), June 26, 2019 at 8:30 AM China Standard Time, and July 1, 2019 at 7 p.m. Central European Summer Time, with two spots being offered on each of those dates. [Exhibit 2]
- 8. On June 20, 2019, at 1 pm CST, the Around the World in 80 Days offer was opened to the public.
- 9. Immediately at the opening, Plaintiff successfully entered the offering and was advanced through the Defendant's system to a page reading "Review and Pay" at the top. [An accurate facsimile of such page is attached hereto as Exhibit 3]
- 10. Defendant's Review and Pay page required entry of the Plaintiff's name, a valid credit card number, expiry date, and authorization code.
- 11. If any information, including payment information were not entered, Plaintiff would not be allowed to accept Defendant's offer.
- 12. Plaintiff paid a minimum of \$5150 because Defendant offered no alternative means of entry, and Defendant's website offering page did not include a "No Purchase Required" or similar notification.
 - 13. Using his computer's "form autofill" function, within seconds the Plaintiff correctly and

successfully entered all required data, including valid credit card information.

- 14. After full entry of the information, the Plaintiff was required to activate a button with a secure lock symbol with the words "Confirm and Pay" before the page would advance and show confirmation. [Exhibit 3]
 - 15. Plaintiff immediately activated the "Confirm and Pay" button.
- 16. Defendant immediately accepted Plaintiff's payment tendered in acceptance of Defendant's offer on the entry webpage, with a message reading to the effect of, "Thanks, we'll be in touch soon." [Exhibit 3]
- 17. Immediately after Defendant accepted Plaintiff's payment Plaintiff's bank posted a charge to the credit of the Defendant in the amount of \$5150, describing the payment as "AIRBNB *TAEWHCH3" [Exhibit 4]
- 18. At 1:09 pm, Plaintiff received an email message from Defendant indicating Defendant's acceptance of Plaintiff's reservation and successful payment in full, issuing receipt #RC2K4TJRCZ and the same confirmation code as was given to the Plaintiff's bank. [Exhibit 5]
 - 19. A link in Defendant's confirming email advised Plaintiff to "Go to itinerary."
- 20. On activating the "Go to itinerary" link, the Plaintiff was taken to a scrolling page with the detailed descriptions of the Around the World in 80 Days offering, complete with pictures locations and instructions regarding Plaintiff's visa requirements. A printout of the itinerary would consume over 16 pages. [Exhibit 6]
- 21. Defendant retained the expert services of MT Sobek as its full travel coordination to benefit the successful travelers, and Defendant assured Plaintiff was assured that all Plaintiff would be required to do was have sufficient passport pages, purchase a round trip ticket to

London, and "be on that first flight." [Exhibit 6A]

- 22. Defendant, in its receipt, stated that Plaintiff had satisfied all aspects of the Defendant's offer when Plaintiff's payment was accepted. The receipt indicated, "Airbnb Payments, Inc. ("Airbnb Payments") is a limited payment collection agent of your Host. This means that upon your payment of the Total Fees to Airbnb Payments, your payment obligation to your Host is satisfied." [Exhibit 5]
- 23. Defendant defined "your host" as "Our Global Community" consisting of more than 50 worldwide local hosts all coordinated by Defendant and secured by MT Sobek as adventure planners. [Exhibit 5A]
- 24. Immediately after receiving confirmation of his winning entry, Plaintiff returned to the Defendant's offering page, where the Defendant's page read that the offering had "SOLD OUT," confirming that the Plaintiff had hesitated at any point in the offer and acceptance process, the page would not have advanced to the "Review and Pay" page for entry. [Exhibit 7]
- 25. Plaintiff never cancelled his acceptance of the offer, nor did Plaintiff stop payment or otherwise revoke the fees payable to Defendant in the offering.
- 26. The Defendant's receipt of payment page directed Plaintiff to the Defendant's "Experiences Cancellation Policy" [Exhibit 5]
- 27. The Defendant's Cancellation Policy contained time restrictions on Plaintiff's right to cancel, but did not permit Defendant the right to unilaterally cancel after the Plaintiff had successfully satisfied his obligation for full payment to the Defendant.
- 28. On or about June 21, 2019, the day after Plaintiff's successful acceptance of the Defendant's offer and Defendant's acceptance of Plaintiff's consideration, Defendant unilaterally

cancelled Plaintiff's reservation and refunded Plaintiff's credit card charge. [Exhibit 8]

- 29. Plaintiff's bank did not post a refund until June 21, 2019, the day after the offering. [Exhibit 8]
- 30. After accepting full payment of Plaintiff's total charges for the offering, and issuing a receipt indicating that Plaintiff had fully complied with his obligations, Defendant breached its contract with Plaintiff by unilaterally and without cause cancelling Plaintiff's reservation.
- 31. Given Defendant's description of the offering as a luxury trip valued at a minimum of \$100,000 [Ex 13], specific performance is the remedy Plaintiff requests, in addition to punitive damages, fees, and costs.
- 32. Although Defendant originally advertised that it would offer four other seats in its game of chance on two subsequent dates, June 26, 2019 and July 1, 2019, [Exhibit 2], without notice to Plaintiff, Defendant altered the dates of the subsequent offerings, conflating them so that all four remaining spots would be offered on June 28. [Exhibit 9]
- 33. Defendant repeatedly has altered the dates, times, and conditions of the offering, including the number of spots that were to be available. [Exhibit 9A]
- 34. Promptly at 1 p.m. on June 28, 2019, Plaintiff again entered the Defendant's rescheduled game of chance, and supplied, as Defendant again required, a valid credit card and other information [Exhibit 10]
- 35. At 1:59 pm, June 28, 2019, Defendant notified Plaintiff that Plaintiff was not a winner in the second conflated offering [Ex 10A]
- 36. Unlike the first offering, Plaintiff's credit card was not charged by Defendant in the second offering.

- 37. Defendant has not posted the identities of the persons it has selected as winners in its game of chance.
 - 38. The Around the World in 80 Days offering was a valuable prize offered to Plaintiff.
- 39. The Around the World in 80 Days offering was a game of chance in that not every entrant was a winner of the valuable prize, and Defendant controlled the winner selection process.
- 40. Plaintiff paid consideration for the opportunity to engage in a game of chance operated by Defendant.
- 41. Defendant offered Plaintiff no other means of entering the game of chance other than to pay an entrance fee in the minimum amount of \$5150.
- 42. Defendant has failed to classify its game of chance as a contest or Sweepstakes, and is silent on whether it was a lottery, and has not responded to Plaintiff's request on August 9, 2019 to identify what Plaintiff "Confirmed and Paid for" if not the opportunity to either (a) buy a vacation or (b) engage in a legal and regulated game of chance. [Exhibit 10B]
- 43. Plaintiff had the expectation the Defendant's game of chance would comply with all legal requirements in the State of Oklahoma associated with games of chance.
- 44. Defendant's failure to comply with legal requirements left Petitioner without safeguards afforded to lottery entrants.
- 45. Plaintiff alerted Defendant that Defendant's means of entry and registration of guests appeared to have technological problems [Exhibit 11], and the offering itself has undergone repeated alterations and miscues to the public [Ex 9A].
- 46. Plaintiff most likely would not have encountered the technological and scheduling changes problems and had Defendant's game of chance complied with lottery regulations and

consumer safeguards.

- 47. Plaintiff is an Oklahoma Taxpayer with expectations that any funds remitted in a lottery would be used to support Oklahoma education pursuant to the State Lottery laws. Defendant's effective operation as a lottery requiring an entrance fee did not benefit of the schools in Oklahoma, and thereby incrementally increased Petitioner's tax liability to Oklahoma.
- 48. Plaintiff entered the offering immediately after it was opened on June 20, 2019 at 1:00 p.m. CST
- 49. After receiving confirmation of his full satisfaction of payment obligations, Plaintiff supplied his and his spouse's racial and demographic information to Defendant at 1:13 p.m. [Exhibit 12]
- 50. Defendant informed Plaintiff at 5:58 pm CST that Plaintiff's acceptance of the Around the World in 80 Days offering was cancelled.
- 51. Defendant failed to offer details regarding the selection process, nor has Defendant publicized the identities of the winning contestants.
- 52. Defendant unilaterally cancelled Plaintiff's reservations without explanation after Plaintiff disclosed his family's racial and ethnic origin information.
- 53. Defendants are multinational corporations with large structures, affiliates, contractors, and staff and routinely engage in sale of services such as the one offered and sold to Plaintiff often at a loss for promotional purposes.
- 54. Defendants have the means and ability to perform and deliver according to the terms of the agreement they sold to Plaintiff and are refusing to do so as agreed to by the Parties.
 - 55. That at the time Plaintiffs and Defendant entered into the contract, the consideration to

be paid under the contract was adequate and the contract is just and reasonable as to all Parties including the Defendants.

- 56. That agreement agreed to mandates delivery of services which are unique and as such Plaintiff has no adequate remedy at law.
- 57. That Defendant is able to perform and is refusing to do so for no discernable reason other than costs which would have been known and anticipated in advance of its offer and transfer to Plaintiff by the Defendants.
 - 58. That Plaintiff principally seeks specific performance of the agreement by the Defendant.
- 59. That in the alternative, the Defendants had a duty of care to Plaintiff, in which duty they breached, resulting in damages suffered by the Plaintiff. That furthermore the said breach of duty was the actual and proximate cause of damages suffered by Plaintiff.
- 60. That in the alternative, the Defendants are in breach of the Parties agreement, entitling the Plaintiff to damages and benefits of his bargain.
- 61. That in the alternative, the Defendants are in violation of Oklahoma Consumer Protection Act.
- 62. That Defendants actions are in violation of various governing statutes, violation of which constitutes negligence per se.

WHEREFORE, premises considered Plaintiff prays that upon hearing this cause the Court grant and specifically order performance on the part the Defendants, and in the alternative all causes of action in law or equity supported by evidence including but not limited to "Breach of Contract," "Lottery," violation of "Consumer Protection Act" and "Racial Discrimination" attorney fees, costs and such other and further relief as the court decms equitable and proper.

s/ Edward F. Saheb

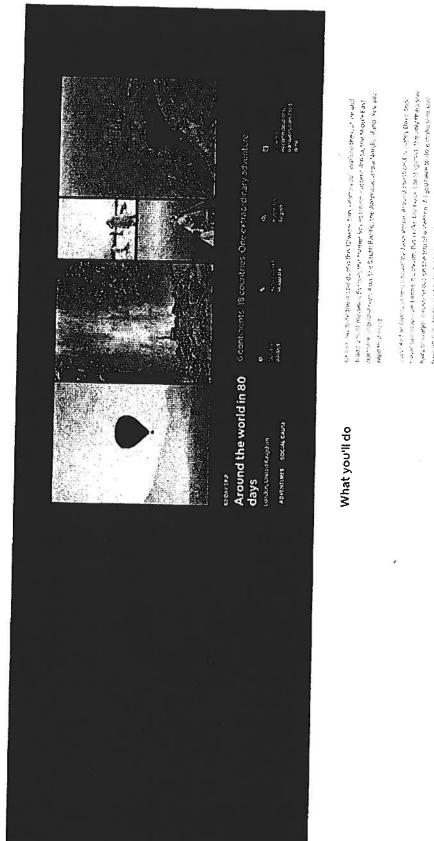
Edward F. Saheb, OBA# 18987

Law Offices of Edward F. Saheb & Associates

1025 S.W. 4th Street, Ste 200

Moore, OK 73160

Telephone: (405) 528-2222 Facsimile: (405) 691-5125 e-mail: saheb222@ yahoo.com



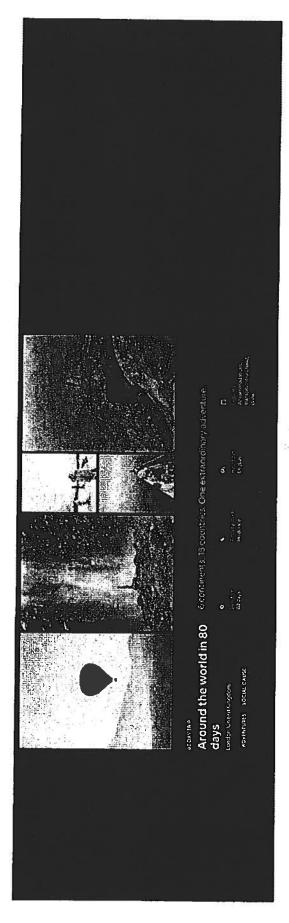
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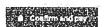
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Ex 5A

Your host



Our Global Community

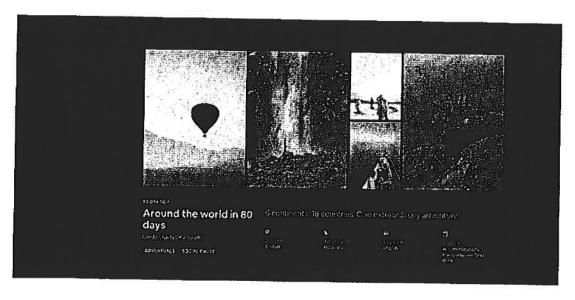
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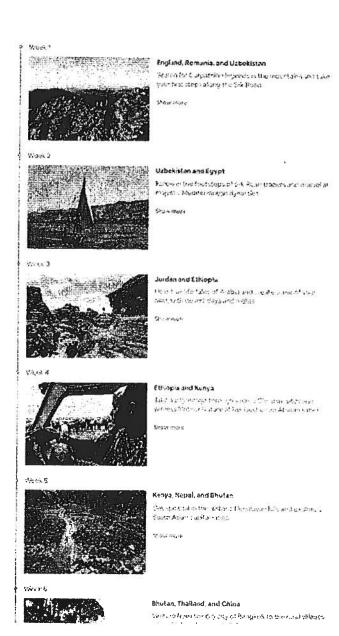
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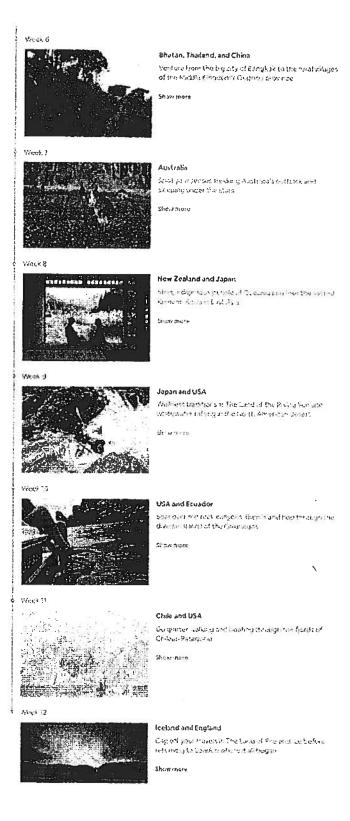
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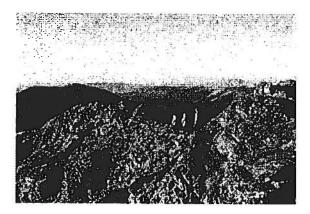
England, Romania, and Uzbekistan



Hosted by Our Global Community

Travel from 2 lst century London to 19th century Bucharest, Romania and get to know your surroundings with a walking tour of Old Town before sitting down to a welcome rinner. The next day, know the capital city for the Carpathian Mountains, where you'd spenu 3 days exploring historical remnants and natural wonders, and fill your nights looking for farmous constellations and the most infarmous count in Transylvania (and the work!): Crocala himself.

if you're lucky chough not to find him, you'lt enjoy a sweet day with namey been before heading back to Bucharest and flying to Tashkent, Gabekisten. Destroyed by Gonghis Khan in 1219, explore what remains, how the city was rebuilt, and immerse yourself in its religions and open air nazaers—two of the countless things exchanged along the Sik Road, the historic trade route triat connected the East and West. After dinner, take an overnight train ricle to Bukhare, where you'll learn about its unique Jewish heritage before having the rest of the day to yourself to relax or take in more of the Silk Road ress traveled.



What's included

" Gibrealfasts, 5 lunches, 7 dinners

Where you'll be

Fly from urbar London to historic Romania, where you'll spend 3.5 mays exploring the history and heart of Transylvania in Bucharost, the Carpathian Mountains, and medieval to who. Then it a time to head to Tashkent and Rukhara, two ancient cities in Uzbekistan.

Notes

All fare to London not included in price. Guests are responsible for booking and purchasing a roundtop flight to and from the start and end point of the adventure.

Uzbekistan and Egypt

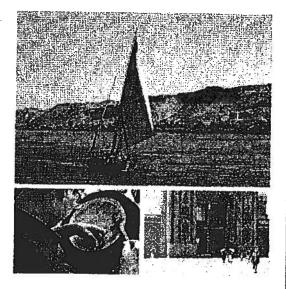


Holseo by Our Global Community

Your journey through the former Sourch republic continues. After a marring visit to the palace of the last emil (Arph ai stocrat) and the final resting place of the founder of Sofrishing, we'll drive to a stiage within the Bukhara region, and meet a family whose been demoated to creating ceramics for 6 generations. You'll watch how they turn day into craft and try it for yourself to get a sense of what it took to make some of the goods sold on the Silk Road

The coute stratches throughout the Central Asian nation and after visiting the roles where many travelers stopped to rest or the 11th century, we'll take a road trib to Samarkand --a location so strategic to the Silk Road that it's now a UNESCO World Hereage Site. Chir less days in Uncekistan will be spend here, exploring mosques, may solverns, and markets, where you can sample rathron, bread, wine, and other local delicacies

Then you'll go even further back in time to the kind of prarachs in Cairo, Egypt, with a stop at its national museum and Talarr Square, A. mund one hour flight later, you'll visit a temple in Lyxor (the real one. not the one in Veges, that took over 1,000 years to build and explore the Valley of the Kings and Queens Finally, you'll heard a sallous for a 3 day cruise along the falle, stopping at shores, villages, and temples along the way.



What's included

- ** 7 breakfasts, a binches, 6 eigners
- # Hotels, beat cabin
- Flight, to Caro and Loxor, Egypt. All venicle and beat transfers. between stoos

Where you'll be

Whapping up your Central Asia advanture and heading to North Adrica, where you'll spend 4.6 days learning about historic Egyptian Week 4

Ethiopia and Kenya



Hosted by Our Global Community

With churches carved into the earth, it's not hard to understand why Laibelais considered one of the holest places in all of Ethiopia Dating back to the 12th century, you'd next these places of wo ship. with ties to Christianity before moving on to Axest—a northernody with archaeological sites so valuable they were added to the UNESCO list of World Heritage Sites and where it's believed the Ark of the Coverant was once protected

how here's where this adventure really gets wild because it's time to trade in historical sites for patient ones in Navobi, Kenya, After a short stop back in Addis Adalse, yed'il spend 4 days on salari ma private destination located port to the Masai Mara Mational Reserve. where you'll wake at dawn to observe big cats, idepliants, and other rare species when they're most active. Take time to rest back at came in the afternoons before heading out for cool evening talans and more chances to specific Big-Five. On your final day, spot us many as you can by pir cluring a not air balloon ride over the plans where wildlife wander.



What's included

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- * todge testels, glamping site
- Flights to Latibele and Axiom, Ethiopia, and Maircei, Kenza. All venicle transfers inflymen stoos

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Week 5

Kenya, Nepal, and Bhutan



Hosted by Our Global Community

Determined to leave a histing impression. Kenya offers one final day on safari and a day in Hairabi for you to get situated before flying to Kathmandu, Nepal, Sitting 1400 metres (4,000 feet) above sea level. the Nepaletin capital is sucreous Katheranda Valley and home to 7 UNESCO World Pentage Sites.

With a rich array of services, roots, and markets, Eathmandus known for its culturar heritage and has rightly parned its City of Temples. monitor. Experience it for yourself on your first full day with a visit to the medievoi Bhaktapur, whose name translates to i pince of devoters' and a tow of Europe Square-innered four regal parace. plazas filled with Findo and Buddhist temples, and home to Sun Dhoka, the Golden Calle doorway leading to the palace of 55 windows

The following day you'll visit the Durbar Separcial Kalmmando and one of its famed bazaars, where your senses will be surrounded by local staces, produce, and ponds that can be energize you before a visit to Swayomt funath and its very spiritual monkeys. The remainder of your time in Nupal is yours before making our way to Shutan where we'll spend the next several days.



What's included

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- # Glamping site, notets
- Flights to Cethinardo, Hopat, and Parc. Briefan. Alivebrile transfers between staps

Where you'll be

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Jordan and Ethiopia

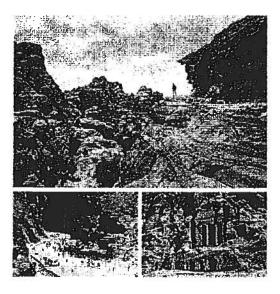


Posted by Our Global Community

Following breakfast on the Nile, Fy to Amman, Jordon, by way of Core. You'll spond the right in the original of this Arab nation in Western Asia, before heading nouth to a number of desert destinations. Our first stop is Karak whilitopicity along the King's Highway that was integral to the Crusaders. Then we'll venture further south to the Wadi Araba desert and spend time with nomadic Arabs known as Bedouin, who'll teach you how to mis traditional counieties, brew local coffee, or take you on a scientifiake

The scenary continues during a full day excursion to Petra, where you'll debeitely want to make sure your comera is charged. Famous for its historical and architeological significance, we it wask through the narrow carryan that opens up to one of the world's most beautiful sights, in your guide shows you everything there is to see in the Rose City and shares stories of the wealthy who bull it.

Your days in the desert vallend at the Dead Sea and floating in its healing mineral waters. Take your pampeoing even further audsplurge on a spaltrestiment (go ahead, you deserve it) before our Egyption farmer dicines. The last day of the week will be spem. getting to and explaining Addis Abstra, Ethiopia, and learning about the evolution or both humans and the Rastefallan faith.



What's included

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- # Hotels loages
- A l'agits to Ammer, Jordes and Addo Apples, Ethiopia, All vehicle transfors between stops

Where you'll be

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Week 6

Bhutan, Thailand, and China



Hosted by Our Global Community

After excroling the capital of Bhotan and it, major sites, this week starts back in Pare with stops at the National Museum and hadzong (Buddhist monastery and forthess). Cir your final day in this city along the Eastern Himmlayas, you'll hike to a traditional teahquise with the option to continue to Takesang Monastery, recontly restored and one of the country's major of grinnage spots.

The good landscapes of Shoran will be followed by the holdle and bontle of Bangkok, where you'll have one night to book a missage. transperty the peol, or otherwise enjoy the shrines and street life of finalised's capital city. Then it sails to Guiyang in Southwest China. where you'll start your exploration of an entirely different way of life.

The villages of the Guizhou province are nested amongst misty mountains, bernius groves, and rice terraces. Each day, you livest a different local community to see how traditions have been preserved in food, daily gress, and culture. The is an area rich in the arts, so you li wistch a local opera and get to know the craftspecials of the Mao villages renowned for their jewelry, embroidery brecasts, and batik. Explore buzzing alaht marketa vihera you might jost alah w set of bembooliushing dipes to call your own, and stay with a hest family to see daily life up close. After 4 amatery days, it shack to the big city-Bej na



What's included

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- # Hotels, homestay

Where you'll be

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Week 7

Australia

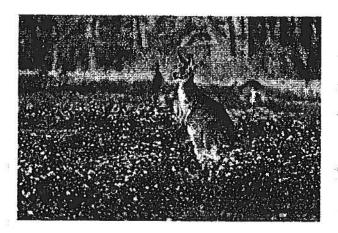


Hosted by Our Global Community

Grah your bags because you're heading down under to Sydney for a good night's sleep.

Next, we fly to Adelaide and stay the night. The morning after, you'll board a charter flight to Hawker, a small outback town, and hop in a car to continue the journey to Wilpena Pound. After orientation and breakfast, you'll walk the trail for 3 days, surrounded by a natural amphithcater of 800 million year old mountains in the heart of a national park, if you're looky, you'll get to meet kangaroos, wallables, bushbaties, and other Australian looks along the way.

Each night, you'll get to sleep under the open night sky in a "star user" (something you'll definitely tell your friends about). Then, you'll end your trek in true Australian fashion—in an 1850's homestead, surrounded by a feast and comfortable furnishings. You'll soon return to Arielaide with a souvenir full of memories to get ready for your next journey in New Zealand.



What's included

- 11 / preakfasts, 7 bindhes, 5 dinners
- * Hotels, homestay, private camp site
- Flights to Beiling, China, and Adelaide and Hawker, Australia: All vehicle transfers between stops

Where you'll be

Your 7 day Australian journey starts in Sydney From there, you'll take a fight to Ade'taide, a plane to Hawker, hop in the car to Wilpena. Where 3 of those sinys will be sport walking around the outback.

Vicek 8

New Zealand and Japan

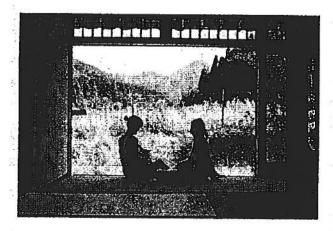


Hosted by Our Global Community

Get off the plane and receive a warm "kia ora" (or "hello") in New Zealand, where you'll spend the next few nights exploring this island country. There's no better way to start your visit than a white wine tasting, especially since the Sauvingon Blanc is legendary.

Even more delebrated? Its stunning landscapes. Also known as The Land of the Long White Cloud, you'll see how it earned that mickname when you board a helicopter and soar over ice-carved mountains, past glaciers, and into a remote valley. After a breathtaking hike and a boat ride across its idylic waters, you'll get to know the Maori culture and spend 2 days getting to know a rich and diverse community you won't find in many guidebooks.

Next stop: Osaka, Japan, where you'll spend the night and wake up to a private partide to the Kill Peninsula. There, it's 3 days of hiking along the Kumano Kodo, a senes of ancient pligrimage routes for wealthy Samoral that also links three sacred shrines (Bonus: It's also a UNESCO World Heritage Sito).



What's included

- " 7 breaklasts, 7 functies, 4 denners
- # Hotels
- Flights to Queenstown, New Zealand, and Osaha, Japan, All vehicle transfers between stops.

Where you'll be

You'll start in Queenstown, New Zealand, getting to know the Mapri - culture and regional scenery over the course of 4 days. Then you'll hop on a plane to spend the next several days among the sucred - hop or a Ceate - James Week 9

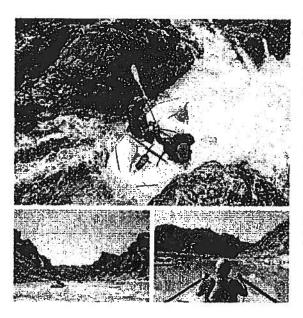
Japan and USA



Hosted by Qur Global Community

Round out your time along Japan's sacred Samural pilgrimage with forest balling, a time-honored tradition of meditative welks in the woods. Your stay at a focal ryckan will reinforce your connection with nature, thanks to traditional Japanese country cursing made with local organic fore and soaking tubs filled from nearby hat springs. The perfect place to relocalter a long like.

From the last rainforest of Japan, we need to the rainbow-heed dieserts of the American southwest. Well fly from Oseko into Sail Lake City, Utah, then drive to Mosti, a popular jumping off point for adventure sports in the states. Our next adventure? One of the world's great rafting trips. We'll paddle more than 94 miles amid the technicalor mesas, spires, and rock formations of Canyoniumos National Park, tacking some of the world's best whitewater rapids. At right, we'll camp on sugar rand riverfrom epaches beneath the desert sky.



What's included

- 11 7 preakfasts, 7 funches, 3 dinners
- # Hotels, inn private camp
- Flights to Still Lake City and Moob, Litab, in the US. As unlined. transfors between stops.

Where you'll be

We'll finish exploring the losh temperate relatorests of the Kr Personal in southeastern Japan. Then we'll fly to Selt Linke City and crive to Canyonlands National Park for a 4 day rafting top through Catalact Calvon

Week 10

USA and Ecuador



Hasted by Our Global Community

Finish your time in Utah with a jaw-dropping flight over the technicolor rock formations of Canyoniands National Park and a nike among Native American runs and otherworldly landscapes

Then we'll depart for the Galapagos. Due to their isolation 1,000 km (620 miles) off the coast of Equator in the Pacific, these volcanic islands have some of the most diverse animal and marine life in the world. You'll be getting up close and personal with this stunning archipelage, with visits to Saltra island, Santa Cruz island, and Tortuga Bay, in search of blue feeted poobles, Iguanas, flamingus, and massive tortoises on find, and kayaking and saling along the surface to spot sea lions, rays, and tropical fish.



What's included

- 11.7 breakfasts, 7 lunches, 4 ú nners
- * Inn, private camp, hotel, yacht
- Elights to Quito, Ecuador, and Baltra Island in the Galagagos. All vehicle and boat transfers between stops

Where you'll be

From the American Southwest, we'll fly south to Greta, Equidor, transferring to Baitra Island, the gateway to the Galapagos' From here, we'll spend 5 days exploring the archipologo.

Week II

Chile and USA

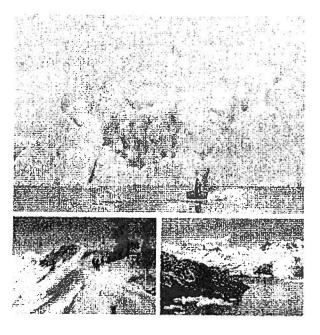


Hosted by Our Global Community

Well and our time in South America in the wilds of Chilean Patagoriu, The region's dramatic forests, emerald takes, and sauphire blue glaciers have long jured explorers from Magelina to Carville

Well embark on our own adventure from Punta Arenas, driving to the small fishing village of Puerto Natales. From here, you'll spend 3 days floating among the fjords of the Southernice field, the second largest contiguous sheet of ice in the world. We'll spot penguins, go sed kayaking, and hike occess glaciers.

Then it's time to head porth and back towards civilization, with flights through Santiago and the US, as we make our way to durinot stop.



What's included

- 11 6 breakfasts, 6 lunches, 6 dinners
- # Hotels, houseboat
- Flights to Ponta Arenas, Chile, and across the Northern Hemisphere. All vehicle and boat transfers between steps

Where you'll be

For 6 days, we'll be at the southermost typ of South America, on the Children side of Patagoria known as the Magalismes. Then we'll fly morth and back towards Europe.

Week 12

Iceland and England



Hosted by Our Global Community

Try to beat the winter solution as you fly into Reykjavík, the capital of Iceland. You'll learn about its Viking history, and take a day to acclimate to the minimal daylight reaching that far north. The next morning, you'll take a short flight even farther north to Akureyri and Lake Myvath for snowshoeing and relaxing in its steamy nature baths. If the weather conditions are right, you might even catch the Northern Lights.

On your way back to Akureyri, stop to marvel at partially frozen Godafoss winterfall, allegedly where a Viking chiaftoin rejected the Nordic gods. Then for an unforpettable aquatic capstone, sook in the geothermal waters of Rekyavijk's vivid Bion Lagoon. Once you've warmed up, you'll fly back to London and toast to the adventure of a lifetime.



What's included

- 11 3 breakfasts, 3 lunches, 2 clinners
- # Hotel
- Flights to Reykjavík and Akureyri, Iceland, and London, England. All vehicle transfers between stops.

Where you'll be

You'll start in Reykjavik then fly to Akureyri in Iceland's far north, From there you'll continue by van to Lake Myvath, eventually returning to Reykjavik, and then returning to London.

Your host



Our Global Community

At every step of this vegage you free watcomed into the cultural and traditions of each destination by the people who has there. Over 50 feet house will take you to the most-see seen, as well as a ratio off the beaten path - freely limiter was just see and to so much that seyout to wishing for a more time.

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Contact host

About the organization

Michigan Mari

Malala Fund

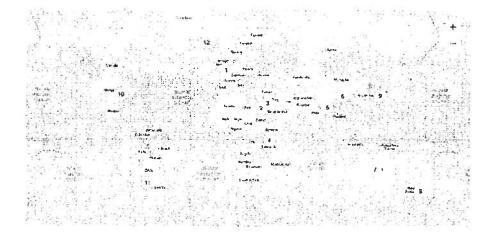
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Where you'll be

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16

Keep these in mind

Cancellation policy

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policy

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Guest requirements

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More tips

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Just like the famous French novel by Jules Verne, Around the World in Eighty Days, this travel tale starts and ends in London. But unlike the book's protagonist, the only thing you have to wager is missing out on the trip of a lifetime. All you have to do is make sure you have enough empty pages in your passport, buy a round trip ticket to and from London, and get on that first flight. When you land, the first chapter of your around the world adventure begins.

Your host



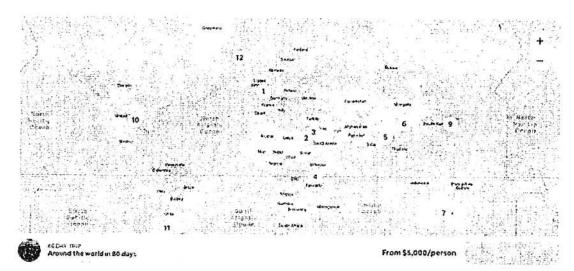
Our Global Community

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Where you'll be

After meeting in London, we'll head east, south, and every other direction, as we make our way through Asia, the Middle East, Africa, the South Pacific, North and South America, and Europe.



Ex8

Transaction details

-\$5,150.00

Jun 21, 2019 Transaction date

Airbrib (415) 800-5959

Jun 21, 2019

Posted date

Description AIRBNB * TAEWHICHS

Also known as Airbob

Cardinumber (...1098)

Category Travel

Rewards earned with this transaction.

How we calculate rewards >

- 1 Point per \$1 earned on travel

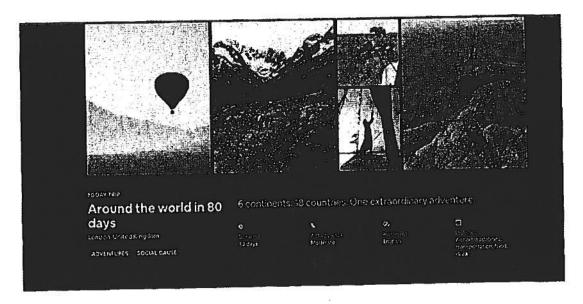
-5,150

+ 1 Point per \$1 earned on all princhases

-5,150

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What you'll do

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What's included



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Transportation

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food

ig nyes mesapytherosolsisch objektive aleitelmig osephiset fürer öbere Jest unteks The trip is for people ages 21 and older and includes all transportation between destinations, lodging, meals and visas. You just have to book a spot and a flight to and from London, where the trip kicks off on Sept. 1 and returns on Nov. 19.

The catch? There are only six spots available, and Airbnb is releasing them two at a time. The company originally announced there would be eight spots, available at 9 a.m. Eastern Time on June 20, but has since released updated information. Three pairs of spots will be available between now and July, announced in different time zones around the world.

The first two spots will be released at 2 p.m. Eastern Daylight Time on June 20; the second two are bookable at 8:30 a.m. China Standard Time on June 26 (8:30 pm Eastern on June 25), and the final pair goes on sale at 7 p.m. Central European Summer Time July 1 (1 p.m. Eastern).

The adventure is operated by MT Sobek, a luxury travel company that's been taking folks around the world since 1969. MT Sobek designed the trip specifically for Aironb (you can't book it anywhere else) and it's valued at about \$100,000 per person. Aironb is offering it at such a discount because all Aironb Adventures are currently capped at \$5,000 per person.



Thanks, we'll be in touch noon

Yans, also of people mail to us an the adventural if you're one of the first 4 people what sed to use well many joins the posthour artiferstructions an him to complete your booking.

Review and pay

however, and more framely to the descriptive and professing an reservation.

Guests ages 21 and up that extend the rolls guests agen \$1 and up can acres of the activity book for this adventure is moderate. Guint a about a feet submit restable participating at 2 hours of organization to the Expression of the participant and larger taken, buling, knyoking, horse or cause riche, impriselyng, etc. Only the first A spots booked at 10 am PST chanday, June 28 will be confamed. A nanking what confirmed ent3 Airbinti ser 6 : 4 detulo de confirmation uniad victo ibnerary quel ment stops to complete president increquentments. Sport on the adventure cash be transferred or resold. Once your Expelling is confirmed, you therein it are finapacket with a distalled stines ory and all structions to domainte palor to decorrors from rentiting travel dus servita to involcal conscionations, packeng renormanistations, and destination info; the probation on one years prepared for the 80 day action time. All ejectioned quests must have a president rate through May 20, Put 0. Science Countries research visit for entry and entry rentime ments may viry by nutringship. Vision are applicated at the reserving country's discretion and could be procurational by Arbert, our is the cost of any visit a clothed in the prilance this top. On conjour wooking is confirmed, we a provide you with a resource for an istance is obtaining your four-it visue if you're analyle to complete the necessary hip prendration, your backing may be concern). Please, note, soft travelers may on extend to charala riche. This observative is any available to the public and exert on exchedicy directors, efficient, employees or eigents of MT Softes or Alibability may risubsidiated or all lotes for the members of three people's remediate foreless or tocarbolds lessering a spound porces, industrialities, creicines, parentes, sibarego, grandicalente, and granden adrend

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Around the world in 80 days 14 hours to purely in 15 hours to purely in 15 hours of Continuanty



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Total (USD)

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Review guest requirements

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Case 5:19-cv-01157-G Document 1-2 Filed 12/12/19 Page 39 of 43

Ex. 10A

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Ex 10B

AUGUST 9, 2019

D. A. 11.56 PM

Olivia,

I really appreciate your reply. I'm sorry that we are getting further apart, not closer, to resolution. I continue to have problems with your conclusions on the exact same fronts that I listed in my July 10 memorandum to your executives Belieda Johnson and Aisling Hassel. These were grounded mostly on the state and federal contract law principles, consumer agency protections, and potential discrimination inquiries that all remain unsettling. Further, my lawyer (with whom I coincidentally will meet this evening), confirmed perhaps a more troubling issue with the drawing which you now seem to consider neither a contest nor sweepstakes. What exactly did I "Confirm and Pay" for? An entry fee? The right to be considered? Was there a reasonable alternative means of being a viable contestant without a credit card? How many other entrants also had their cards charged? Jurisdictionally speaking, was this offering open to people throughout the USA., the world? As I stated, refunding means nothing once Airbnb initiates the critical triggering consumer financial transaction. whether the refund benefits the consumer in a nanosecond or a day later (as was the case with me). Thope you get this right away and let me know whether you are representing Airbnb's final position on this. Thanks,

Dwavne

JUNE 20, 2019

- D. A. 102PM
 Signed up for today and credit card was taken, but needed two sites
- The verification code I have is TAEWHVH3. The number of persons/travelers scroll locked on 1. We were first, but the system seem to cause us to have to enroll twice. Help!

JUNE 20, 2019

D. A. 1.02 PM

Signed up for today and credit pard was taken, but needed two sites

D. A. 1.13РМ

The verification code I have is TAEWHVH3. The number of persons/travelers scrofflocked on 1. We were first, but the system seem to cause us to have to enroll twice. Help!

I just got the receipt from Airbnb with the ID being RC2K4TJRC2

Help! Because my wife and I really want to go!

Together.

"Writer and photographer who both quit successful careers in their 40s to pursue a life of travel together. Diverse couple, with him being African American who just uncovered genealogical roots in three Central African countries as well as Sweden, England, Norway, Ireland. and Native America. She's a descendant of people who populated the great sprawing Persian Empire inclusive of Iran, Turkey and other Middle Eastern countries. They both love and respect all cultures, and treat the homes of others the same way they'd want them to treat theirs. Very outgoing (but not chatty), neat, disciplined and independent. They love reading, nature, and uncharted adventures. They ve formed lifetime friendships with people all over the world. and each has spent significant time working professionally for international charities that help elleviate poverty and above. Some of the favorite places traveled in-depth: Solomon Islands, Kenya, Turkey, Egypt, Peru, Costa Rica, Czech Republic, Thailand, Brazil, Austria, Canada, Denmark, Uganda, Guatemala, New Zealand, Tanzenia, Spain, Belize, Nicaragua, Greece, Estonia, Russia, South Africa, France, Italy. Portugal, Norway, Vanuato, US Virgin Islands, Israel, Sweden, Moracco, British Virgin Islands, Zambia, Zanziber, Vietnem, Australia... whewl Most travels have been connected with Airbnb hosts with occasional backtracking to re-meet the friends they we made while inibally staying in their homes. Check out our Airbnb profile and host reviews! https://www.arbnb.com/users/snow/467239

*

Our Global Community \$58.24 Hi D.A.,

The Around the world in 80 days adventure is proving extremely popular and a lot of people tried to book it.

Please note that the email receipt you received is not a booking confirmation—that email receipt was automatically triggered when your payment was submitted.

Unfortunately, more spots were requested than were available. As a result, your reservation was not completed and although a charge may be pending on your card, a refund was immediately initiated and the cost of the trip will be credited tack to your card soon. We sincerely apploping for any confusion this may have caused.

To learn more about how refunds work, click here: https://www.autreb.com/neis/article/1967/v.hom-enfs.get-myrefund

D. A. 631641

Not fair! Not even as explained in your disclosures. To whom shall we go to appeal?

Ex 13

The adventure is operated by MT Sobek, a luxury travel company that's been taking folks around the world since 1969. MT Sobek designed the trip specifically for Airbnb (you can't book it anywhere else) and it's valued at about \$100,000 per person. Airbnb is offering it at such a discount because all Airbnb Adventures are currently capped at \$5,000 per person.