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### What 9th Circuit ADA Ruling Means For Closely Related Entities

As a matter of first impression, on April 7 a panel of the U.S. Court of Appeals for the Ninth Circuit held that two related employers may be treated as one integrated employer to meet the 15-employee headcount threshold under the Americans with Disabilities Act.

In *Buchanan v. Watkins & Letofsky LLP*, the Ninth Circuit reversed a district court judgment in favor of Watkins & Letofsky, a Nevada limited liability partnership, and found that a plaintiff can bring a claim under the ADA if the plaintiff can establish that the defendant is so interconnected with another employer that the two form an integrated enterprise, and the integrated enterprise collectively has at least 15 employees.

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