

The Ninth Circuit has affirmed its position that Title II of the Americans with Disabilities Act (ADA) validly abrogates sovereign immunity. In *Philly v. City of Philadelphia*, 915 F.3d 1111 (9th Cir. 2019), the court held that Title II's abrogation of sovereign immunity is valid under the Eleventh Amendment. The court's decision is a significant victory for individuals with disabilities who seek to enforce the ADA against state and local governments.