

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA**

WALT DISNEY PARKS AND RESORTS U.S., INC.,

Plaintiff,

v.

RONALD D. DESANTIS, in his official capacity as Governor of Florida; MEREDITH IVEY, in her official capacity as Acting Secretary of the Florida Department of Economic Opportunity; MARTIN GARCIA, in his official capacity as Board Chair of the Central Florida Tourism Oversight District; MICHAEL SASSO, in his official capacity as Board Member of the Central Florida Tourism Oversight District; BRIAN AUNGST, JR., in his official capacity as Board Member of the Central Florida Tourism Oversight District; RON PERI, in his official capacity as Board Member of the Central Florida Tourism Oversight District; BRIDGET ZIEGLER, in her official capacity as Board Member of the Central Florida Tourism Oversight District; and JOHN CLASSE, in his official capacity as Administrator of the Central Florida Tourism Oversight District,

Defendants.

Case No.
4:23-cv-00163-MW-MJF

**PLAINTIFF'S FIRST AMENDED NOTICE UNDER
FEDERAL RULE OF CIVIL PROCEDURE 5.1 AND LOCAL RULE 24.1**

Plaintiff Walt Disney Parks and Resorts U.S., Inc. (“Disney”) files this notice of constitutional challenge to Senate Bill 4-C, Fla. Laws ch. 2022-266 (amending Fla. Stat. § 189.0311) (“Senate Bill 4C”), House Bill 9-B, Fla. Laws ch. 2023-5 (“House Bill 9B”), Senate Bill 1604, Fla. Laws ch. 2023-31 (“Senate Bill 1604”), and the legislative findings and declaration by the Central Florida Tourism Oversight District on April 26, 2023 (“Legislative Declaration”) that Disney’s contracts are “void and unenforceable.” This notice is given under Federal Rule of Civil Procedure 5.1 and Northern District of Florida Local Rule 24.1.

In this case, Disney challenges the Legislative Declaration and Senate Bill 1604 as unconstitutional under the Contracts Clause, the Takings Clause, and the Due Process Clause. *See* U.S. Const. art. I, § 10, cl. 1; U.S. Const. amend. V; U.S. Const. amend. XIV. Disney also challenges Senate Bill 4C, House Bill 9B, Senate Bill 1604, and the Legislative Declaration as unconstitutional under the First Amendment. *See* U.S. Const. amend. I, amend. XIV. Disney’s First Amended Complaint asserting these constitutional violations is attached.

Dated: May 8, 2023

Respectfully submitted.

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Attorneys for Plaintiff Walt Disney Parks and Resorts U.S., Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on May 8, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I further certify that I will send the foregoing document and the notice of electronic filing to the following: by U.S. Mail, return receipt requested, and email, to John Guard, Chief Deputy Attorney General, john.guard@myfloridalegal.com, James Percival, James.Percival@myfloridalegal.com, Henry Whitaker, Henry.Whitaker@myfloridalegal.com, and Daniel Bell, Daniel.Bell@myfloridalegal.com, Office of the Attorney General of the State of Florida, PL-01, Tallahassee, FL 32399-1050, by U.S. Mail, return receipt requested, and email, to Charles J. Cooper, ccooper@cooperkirk.com, Cooper & Kirk, PLLC, 1523 New Hampshire Ave., NW, Washington D.C., 20036, and by U.S. Mail, return receipt requested, to Eryka Washington-Perry, Central Florida Tourism Oversight District, 1900 Hotel Plaza Blvd., Lake Buena Vista, Florida, 32830.

I further certify that I will send foregoing document and the notice of electronic filing by U.S. Mail, return receipt requested, to the following recipients:

Office of the Attorney General
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