

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA  
CIRCUIT CIVIL DIVISION**

CENTRAL FLORIDA TOURISM  
OVERSIGHT DISTRICT,

Plaintiff,

v.

CASE NO.: 2023-CA-011818-O

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

Defendant.

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**NOTICE OF TAKING DEPOSITIONS**

PLEASE TAKE NOTICE, that Plaintiff, Central Florida Tourism Oversight District (the “District”), by and through its undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.310, gives notice of taking the deposition of the persons named below:

<b><u>DEPONENT</u></b>	<b><u>DATE AND TIME</u></b>	<b><u>LOCATION</u></b>
Ed Milgrim	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.
John McGowan	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.
Scott Justice	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.
Todd Rimmer	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.
Carlos M. Brackley	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.

Adam Babington	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.
Kathy Hattaway, Predevelopment Advisors, LLC	Date and time to be determined after conferring with opposing counsel.	Remote video conference, link to be provided.

Additionally, the District gives notice to take the deposition of Walt Disney Parks and Resorts U.S., Inc., at a date and time to be determined after conferring with opposing counsel, and to be taken via remote video conference (link to be provided). Consistent with Florida Rule of Civil Procedure 1.310(b)(6), examination at this deposition is requested on the following topics:

- a) The selection of members of the Reedy Creek Improvement District Board of Supervisors, including how and why particular members were chosen, related land transactions, and contacts between Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries and any Board of Supervisors member during that member's service.
- b) The selection of members of the City Councils of the City of Bay Lake and City of Lake Buena Vista, including how and why particular members were chosen, related land transactions, and contacts between Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries and any City Council member during that member's service.
- c) Theme park tickets, Disney discounts, and other forms of consideration that Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries made available to former members of the Board of Supervisors and employees of the Reedy Creek Improvement District.
- d) Information about the extent to which Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries pass taxes through to renters, businesses, or other entities on property owned by Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries.
- e) Conceiving of, drafting, negotiating, and entering the Development Agreement and Restrictive Covenants.
- f) Investments or actions in Florida done by or planned by Walt Disney Parks and Resorts U.S., Inc. or its subsidiaries in reliance on the Development Agreement and Restrictive Covenants.

Each deposition will be taken before a court reporter or some other notary public for the State of Florida, or some other officer duly authorized by law to take testimony, or its duly authorized representative. The examination of each deponent may continue from day to day until completed or may be adjourned to be reconvened at such later date as may be established by those in attendance at such deposition. Each deposition is being taken for purposes of discovery, for use at trial and for such other purposes as are permitted under the Florida Rules of Civil Procedure. CFTOD does not intend to use these depositions to support its pending Motion for Summary Judgment, for which the CFTOD does not contend there are any material facts in dispute.

Dated: November 16, 2023

Respectfully submitted,

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*Counsel for Central Florida Tourism Oversight District*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of November, 2023, a true copy of the foregoing was served via email to: Adam Losey, Esquire at [alosey@losey.law](mailto:alosey@losey.law); M. Catherine Losey, Esquire at [closey@losey.law](mailto:closey@losey.law); Alan Schoenfeld, Esquire at [alan.schoenfeld@wilmerhale.com](mailto:alan.schoenfeld@wilmerhale.com); Daniel Petrocelli, Esquire at [dpetrocelli@omm.com](mailto:dpetrocelli@omm.com); Jonathan D. Hacker, Esquire at [jhacker@omm.com](mailto:jhacker@omm.com); Stephen D. Brodey, Esquire at [sbrody@omm.com](mailto:sbrody@omm.com); Michael A. Nardella, Esquire at [mnardella@nardellalaw.com](mailto:mnardella@nardellalaw.com); and John J. Bennett, Jr., Esquire at [jbennett@nardellalaw.com](mailto:jbennett@nardellalaw.com).

/s/ Alan Lawson

Alan Lawson