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Walt Disney Parks and Resorts U.S., Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 A.L., et al.,

11 Plaintiffs,

12 v.

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

15 Defendant.

Case No. 2:14-cv-03327-R-RZ

16
17 **ANSWER OF DEFENDANT**
WALT DISNEY PARKS AND
RESORTS U.S., INC. TO
PLAINTIFFS' COMPLAINT

17 Defendant Walt Disney Parks and Resorts U.S., Inc. ("Disney") answers
18 Plaintiffs' Complaint as follows:

19 1. Disney admits that Plaintiffs purport to bring this action under Title III
20 of the Americans with Disabilities Act, the Unruh Civil Rights Act and common law,
21 but Disney denies that Plaintiffs have a viable cause of action or that Plaintiffs are
22 entitled to any relief. Disney denies the remaining allegations in Paragraph 1 of the
23 Complaint.

24 2. Disney admits that this Court has federal question jurisdiction over the
25 claims set forth in the Complaint.

26 3. Disney admits that it is a Florida corporation with its principal place of
27 business in Orange County, Florida. Disney also admits that it owns and operates
28 the four theme parks at the Walt Disney World Resort (The Magic Kingdom Park,

1 Disney-Hollywood Studios, Epcot and Disney’s Animal Kingdom), which is located
2 in the Middle District of Florida. Disney further admits that it owns and operates
3 Disneyland and Disney’s California Adventure, which are located in Orange County,
4 California, and that it is authorized to conduct business in both California and
5 Florida.

6 4. The allegations of Paragraph 4 of the Complaint constitute conclusions
7 of law to which Disney is not required to respond. To the extent that Disney is
8 required to respond, it specifically denies that this district is the most appropriate or
9 convenient venue for this action. Disney denies the remaining allegations contained
10 in Paragraph 4 of the Complaint, except that it admits that it maintains offices within
11 this District.

12 5. Paragraph 5 of the Complaint is Plaintiffs’ characterization of the law
13 and contains no factual assertions to which a response is required. To the extent that
14 Disney is required to respond, it denies each and every allegation in this paragraph as
15 it relates to Disney.

16 6. Paragraph 6 of the Complaint is Plaintiffs’ characterization of the law
17 and contains no factual assertions to which a response is required. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph as
19 it relates to Disney.

20 7. Paragraph 7 of the Complaint is Plaintiffs’ characterization of the law
21 and contains no factual assertions to which a response is required. To the extent that
22 Disney is required to respond, it denies each and every allegation in this paragraph as
23 it relates to Disney.

24 8. Paragraph 8 of the Complaint is Plaintiffs’ characterization of the law
25 and contains no factual assertions to which a response is required. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph as
27 it relates to Disney.

28 9. Paragraph 9 of the Complaint is Plaintiffs’ characterization of the law

1 and contains no factual assertions to which a response is required. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph as
3 it relates to Disney.

4 10. Paragraph 10 of the Complaint is Plaintiffs' characterization of the law
5 and contains no factual assertions to which a response is required. To the extent that
6 Disney is required to respond, it denies each and every allegation in this paragraph as
7 it relates to Disney.

8 11. Paragraph 11 of the Complaint is Plaintiffs' characterization of the law
9 and contains no factual assertions to which a response is required. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph as
11 it relates to Disney.

12 12. Paragraph 12 of the Complaint is Plaintiffs' characterization of the law
13 and contains no factual assertions to which a response is required. To the extent that
14 Disney is required to respond, it denies each and every allegation in this paragraph as
15 it relates to Disney.

16 13. Paragraph 13 of the Complaint is Plaintiffs' characterization of the law
17 and contains no factual assertions to which a response is required. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph as
19 it relates to Disney.

20 14. Paragraph 14 of the Complaint is Plaintiffs' characterization of the law
21 and contains no factual assertions to which a response is required. To the extent that
22 Disney is required to respond, it denies each and every allegation in this paragraph as
23 it relates to Disney.

24 15. Paragraph 15 of the Complaint is Plaintiffs' characterization of the law
25 and contains no factual assertions to which a response is required. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph as
27 it relates to Disney.

28 16. The allegations in paragraph 16 of the Complaint contain conclusions of

1 law to which Disney is not required to respond.

2 17. Disney admits that its theme parks include rides, attractions, shows,
3 parades, costumed character interactions, displays and exhibits, restaurants and
4 eating establishments. Disney denies the remaining allegations in Paragraph 17 of
5 the Complaint because the term “more” is vague and ambiguous.

6 18. Prior to fact and expert discovery, Disney lacks knowledge or
7 information sufficient to form a belief about the truth of the allegations in Paragraph
8 18 of the Complaint, and on that basis denies them.

9 19. Prior to fact and expert discovery, Disney lacks knowledge or
10 information sufficient to form a belief about the truth of the allegations in Paragraph
11 19 of the Complaint, and on that basis denies them.

12 20. Prior to fact and expert discovery, Disney lacks knowledge or
13 information sufficient to form a belief about the truth of the allegations in Paragraph
14 20 of the Complaint, and on that basis denies them.

15 21. Prior to fact and expert discovery, Disney lacks knowledge or
16 information sufficient to form a belief about the truth of the allegations in Paragraph
17 21 of the Complaint, and on that basis denies them.

18 22. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 22 of the Complaint, and on that basis denies them.

20 23. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 23 of the Complaint, and on that basis denies them.

22 24. The allegations in the first sentence of Paragraph 24 of the Complaint
23 constitute conclusions of law to which Disney is not required to respond. To the
24 extent that Disney is required to respond, it denies these allegations. Disney lacks
25 sufficient information or belief to admit or deny the remaining allegations in this
26 paragraph regarding Plaintiffs’ information and belief about the capabilities of
27 persons with cognitive impairments (including the Plaintiffs), and on that basis
28 denies them.

1 25. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 25 of the Complaint.

3 26. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 26 of the Complaint.

5 27. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 27 of the Complaint.

7 28. Disney admits that it replaced the Guest Assistance Card (GAC)
8 program with the Disability Access Service (DAS) program on October 9, 2013.
9 Disney also admits that the GAC did not require guests to obtain a return time for
10 rides and attractions based on the approximate current wait time. Disney further
11 admits that Exhibits 1 and 2 to the Complaint are redacted examples of a GAC, and
12 to the extent that Disney is required to respond, the documents speak for themselves.
13 Disney denies the allegations in this paragraph that purport to contrast the GAC
14 system with the DAS system. Disney lacks sufficient information or belief to admit
15 or deny the remaining allegations in Paragraph 28 of the Complaint, and on that basis
16 denies them.

17 29. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 29 of the Complaint.

19 30. Disney admits that it replaced the GAC program with the DAS program
20 on October 9, 2013. Disney further admits that Exhibit 3 to the Complaint is a
21 redacted example of a DAS card, and to the extent that Disney is required to respond,
22 the document speaks for itself. Disney denies the remaining allegations in Paragraph
23 30 of the Complaint.

24 31. Disney admits that it has knowledge and experience in accommodating
25 guests with developmental disorders and cognitive impairments, but denies each and
26 every other allegation in Paragraph 31 of the Complaint.

27 32. Disney admits that it replaced the GAC program with the DAS program
28 on October 9, 2013, but denies each and every allegation in Paragraph 32 of the

1 Complaint.

2 33. Disney denies the allegations in Paragraph 33 of the Complaint, except
3 that Disney lacks sufficient information or belief to admit or deny the allegations
4 regarding Plaintiffs' disabilities, and on that basis denies them.

5 34. Disney denies each and every allegation in Paragraph 34 of the
6 Complaint.

7 35. Disney admits that the italicized sentences in Paragraph 35 of the
8 Complaint quote portions of the DAS card attached as Exhibit 3 to the Complaint,
9 and to the extent Disney is required to respond, the document speaks for itself and
10 any attempt to characterize it is expressly denied. Disney further admits that in order
11 to prevent fraud and abuse, it requests that a photograph be taken of each guest who
12 is issued a DAS card, and the photograph is then attached to the card. If a guest
13 prefers not to have his or her photograph taken, Disney will issue a DAS card
14 without it. This paragraph contains Plaintiffs' characterization of the law and to the
15 extent Disney is required to respond, it denies these allegations. As to some
16 allegations in this paragraph, Disney lacks sufficient information or belief to admit or
17 deny the allegations, and on that basis denies them. Disney denies the remaining
18 allegations in Paragraph 35 of the Complaint, including all subparts.

19 36. Disney denies the allegations in the first sentence in Paragraph 36 of the
20 Complaint except that Disney admits that since the implementation of the DAS
21 system, it has informed guests that it will continue to work individually with guests
22 with disabilities to provide assistance that is responsive to their circumstances and
23 that they should visit Guest Relations. The second sentence of Paragraph 36 of the
24 Complaint does not accurately characterize what Mark Jones has communicated to
25 guests about the DAS program, and on that basis is expressly denied. Disney denies
26 the remaining allegations in Paragraph 36 of the Complaint.

27 37. Disney denies the allegations in the first sentence in Paragraph 37 of the
28 Complaint because it does not accurately cite the results from the United States

1 Centers for Disease Control and Prevention's March 2014 report. Disney denies any
2 other allegations and/or implications in Paragraph 37 of the Complaint.

3 38. Disney denies each and every allegation in Paragraph 38 of the
4 Complaint.

5 39. Disney denies the allegations in the first sentence of Paragraph 39 of the
6 Complaint, except that Disney admits that the DAS card is primarily designed to
7 accommodate guests who are not able to wait in a conventional queue environment
8 due to a disability. Disney lacks sufficient information or belief to admit or deny the
9 allegations in the second sentence of Paragraph 39 of the Complaint and on that basis
10 denies them, except that Disney admits that it issues DAS cards at Guest Relations.
11 Disney denies the remaining allegations in this paragraph.

12 40. Disney denies the allegations in the first two sentences of Paragraph 40
13 of the Complaint. The remainder of Paragraph 40 of the Complaint contains
14 hypothetical allegations to which Disney is not required to respond. To the extent
15 that Disney is required to respond, it denies each and every allegation in this
16 paragraph.

17 41. Disney denies the allegations in Paragraph 41 of the Complaint, except
18 that it admits that both the GAC and DAS card were initially valid for up to 14 days
19 and that Disney subsequently made them available for up to 60 days with the
20 particular time period being based upon whether the guest had a day ticket or annual
21 pass.

22 42. Disney admits that the DAS card offers guests a return time for rides
23 and attractions based on the approximate current wait time minus ten minutes.
24 Disney also admits that return times may be obtained at Guest Relations kiosks
25 throughout Disneyland and Disney's California Adventure, but that return times are
26 issued at the attractions for the four theme parks at Walt Disney World. Disney
27 further admits that the number of kiosks at Disney's California Adventure was
28 reduced from four to three. Disney denies the remaining allegations and/or

1 implications in Paragraph 42 of the Complaint.

2 43. Disney admits that the GAC program resulted in abuse and fraudulent
3 misuse which was widespread and continuing. Disney denies the remaining
4 allegations in Paragraph 43 of the Complaint as there is no identification of the
5 source of the purported statements described therein and therefore no way to verify
6 their accuracy.

7 44. Disney admits that the GAC program resulted in abuse and fraudulent
8 misuse which was widespread and continuing, and denies the allegations in
9 Paragraph 44 of the Complaint.

10 45. Disney denies the allegations in the first, second, third, fourth, eighth,
11 fourteenth and fifteenth sentences in Paragraph 45 of the Complaint. Disney lacks
12 sufficient information or belief to admit or deny the allegations in the fifth, sixth,
13 seventh, ninth, tenth, eleventh, twelfth and thirteenth sentences in Paragraph 45 of
14 the Complaint, and on that basis denies them.

15 46. Disney denies each and every allegation in Paragraph 46 of the
16 Complaint.

17 47. Disney lacks sufficient information or belief to admit or deny the
18 allegations in the first sentence of Paragraph 47 of the Complaint, and on that basis
19 denies them. Disney denies the remaining allegations of Paragraph 47 of the
20 Complaint.

21 48. Disney denies each and every allegation in Paragraph 48 of the
22 Complaint.

23 49. Disney denies the allegations in Paragraph 49 of the Complaint, except
24 that Disney admits it provides tips and strategies for families of individuals with
25 cognitive disabilities, which include having the guest with a cognitive disability
26 watch videos about the Disney parks (i.e., each park features its own video tour)
27 prior to their visit.

28 50. Disney denies the allegations in the first sentence of Paragraph 50 of the

1 Complaint. The remainder of Paragraph 50 of the Complaint contain hypothetical
2 allegations to which Disney is not required to respond. To the extent that Disney is
3 required to respond, it lacks sufficient information or belief to admit or deny the
4 remaining allegations in Paragraph 50 of the Complaint, and on that basis denies
5 them.

6 51. Disney denies each and every allegation in Paragraph 51 of the
7 Complaint.

8 52. Disney denies each and every allegation in Paragraph 52 of the
9 Complaint.

10 53. Disney admits that it may issue re-admission passes to guests with
11 disabilities in addition to the DAS card. Disney denies the allegations in the first
12 three sentences of Paragraph 53 of the Complaint. Disney lacks sufficient
13 information or belief to admit or deny the remaining allegations regarding Plaintiffs'
14 individual experiences in receiving re-admission passes, and on that basis denies
15 them.

16 54. Disney denies each and every allegation in Paragraph 54 of the
17 Complaint.

18 55. Disney denies the allegations in Paragraph 55 of the Complaint, and
19 specifically denies the allegations and/or implication in the second sentence of this
20 paragraph that guests start each day “unpleasantly” as a result of the DAS system.

21 56. Disney lacks sufficient information or belief to admit or deny the
22 allegations in the first and second sentences of Paragraph 56 of the Complaint, and
23 on that basis denies them. Disney denies the remaining allegations in this paragraph.

24 57. Disney denies each and every allegation in Paragraph 57 of the
25 Complaint.

26 58. Disney admits that it has a long-standing, unwavering commitment to
27 providing a welcoming and inclusive environment and accessible experience for
28 guests with disabilities. Disney further admits that MagicBands are available to

1 guests who visit the Walt Disney World Resort and that they can be used to access
2 rides in connection with Disney's FASTPASS service and re-admission passes.
3 Disney denies the remaining allegations and/or implications in Paragraph 58 of the
4 Complaint.

5 59. Disney denies each and every allegation in Paragraph 59 of the
6 Complaint.

7 60. Disney denies each and every allegation in Paragraph 60 of the
8 Complaint.

9 61. Disney denies each and every allegation in Paragraph 61 of the
10 Complaint.

11 62. Disney admits that it has knowledge and experience in accommodating
12 guests with developmental disorders and cognitive impairments but denies each and
13 every other allegation in Paragraph 62 of the Complaint.

14 63. Disney denies each and every allegation in Paragraph 63 of the
15 Complaint.

16 64. Disney denies each and every allegation in Paragraph 64 of the
17 Complaint.

18 65. Disney denies each and every allegation in Paragraph 65 of the
19 Complaint.

20 66. Disney denies each and every allegation in Paragraph 66 of the
21 Complaint.

22 67. The allegations of Paragraph 67 of the Complaint constitute conclusions
23 of law to which Disney is not required to respond. To the extent that Disney is
24 required to respond, it denies each and every allegation in this paragraph.

25 68. Disney denies the allegations in Paragraph 68 of the Complaint, except
26 that Disney lacks sufficient information or belief to admit or deny the allegations
27 regarding Plaintiffs' financial arrangement with their attorneys.

28 69. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of

1 the Complaint as though fully set forth herein in response to Paragraph 69 of the
2 Complaint.

3 70. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 70 of the Complaint, and on that basis denies them.

5 71. The allegations of Paragraph 71 of the Complaint constitute conclusions
6 of law to which Disney is not required to respond. To the extent that Disney is
7 required to respond, it lacks sufficient information or belief to admit or deny the
8 allegations in Paragraph 71 of the Complaint, and on that basis denies them.

9 72. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 72 of the Complaint, and on that basis denies them.

11 73. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 73 of the Complaint.

13 74. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 74 of the Complaint, and on that basis denies them.

15 75. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 75 of the Complaint, and on that basis denies them.

17 76. Disney lacks sufficient information or belief to admit or deny the
18 allegations in the first sentence of Paragraph 76 of the Complaint, and on that basis
19 denies them, except Disney admits that Mark Jones has spoken to a guest whose
20 initials are D.L., but given that the guest's name is not provided, there is no way to
21 verify if this is the same person. Disney denies the remaining allegations in
22 Paragraph 76 of the Complaint.

23 77. Disney lacks sufficient information or belief to admit or deny the
24 allegations in the first sentence of Paragraph 77 of the Complaint, and on that basis
25 denies them. Disney denies the remaining allegations in Paragraph 77 of the
26 Complaint.

27 78. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 78 of the Complaint, and on that basis denies them, but

1 Disney specifically denies the allegation that the “purpose” of the DAS system is to
2 avoid all lines.

3 79. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 79 of the Complaint, and on that basis denies them.

5 80. Disney denies each and every allegation in Paragraph 80 of the
6 Complaint, except that it lacks sufficient information or belief to admit or deny the
7 allegations regarding the general abilities or habits of persons with cognitive
8 disabilities.

9 81. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 81 of the Complaint, and on that basis denies them.

11 82. Disney admits that it has knowledge and experience in accommodating
12 guests with developmental disorders and cognitive impairments but lacks sufficient
13 information or belief to admit or deny the allegations in Paragraph 82 of the
14 Complaint, and on that basis denies them.

15 83. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 83 of the Complaint, and on that basis denies them, but
17 Disney specifically denies that any cast member treated D.L. or A.L. in a way that
18 was uncaring or unsympathetic.

19 84. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 84 of the Complaint, and on that basis denies them, but
21 Disney specifically denies the allegation in the first part of the last sentence of this
22 paragraph that D.L. and A.L had “no option” but to leave the park.

23 85. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 85 of the Complaint, and on that basis denies them.

25 86. Disney lacks sufficient information or belief to admit or deny the
26 allegations in the first sentence of Paragraph 86 of the Complaint, and on that basis
27 denies them. Disney denies the allegations in the second sentence of this paragraph.

28 87. Disney denies the allegations in Paragraph 87 of the Complaint.

1 88. Disney lacks sufficient information or belief to admit or deny the
2 allegations in the first two sentences of Paragraph 88 of the Complaint, and on that
3 basis denies them. Disney denies the remaining allegations of this paragraph. The
4 Prayer for Relief following Paragraph 88 of the Complaint contains no factual
5 assertions to which Disney is required to respond. To the extent the Prayer for Relief
6 may be deemed to require a response, Disney denies each and every allegation in this
7 paragraph (as well as the subparagraphs therein), and denies that an injunction,
8 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
9 appropriate or required.

10 89. Disney reincorporates its answers to Paragraphs 1 through 66 and 70
11 through 88 of the Complaint as though fully set forth herein in response to Paragraph
12 89 of the Complaint.

13 90. The allegations of Paragraph 90 of the Complaint constitute conclusions
14 of law to which Disney is not required to respond. To the extent that Disney is
15 required to respond, it lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 90 of the Complaint, and on that basis denies them.

17 91. Disney denies each and every allegation in Paragraph 91 of the
18 Complaint.

19 92. Disney denies the allegations in Paragraph 92 of the Complaint. The
20 Prayer for Relief following Paragraph 92 of the Complaint contains no factual
21 assertions to which Disney is required to respond. To the extent the Prayer for Relief
22 may be deemed to require a response, Disney denies each and every allegation in this
23 paragraph (as well as the subparagraphs therein), and denies that economic monetary
24 damages, litigation costs, prejudgment interest, or any other relief sought is
25 appropriate or required.

26 93. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
27 the Complaint as though fully set forth herein in response to Paragraph 93 of the
28 Complaint.

1 94. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 94 of the Complaint, and on that basis denies them.

3 95. The allegations of Paragraph 95 of the Complaint constitute conclusions
4 of law to which Disney is not required to respond. To the extent that Disney is
5 required to respond, it lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 95 of the Complaint, and on that basis denies them.

7 96. Disney lacks sufficient information or belief to admit or deny the
8 allegations in Paragraph 96 of the Complaint, and on that basis denies them.

9 97. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 97 of the Complaint.

11 98. Disney lacks sufficient information or belief to admit or deny the
12 allegations in the first, third and fourth sentences of Paragraph 98 of the Complaint,
13 and on that basis denies them. Disney lacks sufficient information or belief to admit
14 or deny the allegations in the second sentence of Paragraph 98 of the Complaint, and
15 on that basis denies them, except that Disney expressly denies the implication in this
16 sentence that J.S. was “admirably accommodated” only before October 9, 2013.

17 99. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 99 of the Complaint, and on that basis denies them, except
19 that Disney specifically denies (with respect to the allegation regarding repeating the
20 ride over and over again without waiting) that the DAS system is in any way
21 deficient in providing the level of accommodation required by law.

22 100. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 100 of the Complaint, and on that basis denies them.

24 101. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 101 of the Complaint, and on that basis denies them, but
26 Disney admits that it works individually with guests with disabilities to provide
27 assistance that is responsive to their circumstances, and specifically denies the
28 implication that the DAS system changed that fact.

1 102. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 102 of the Complaint, and on that basis denies them, except
3 that Disney specifically denies (with respect to the allegation regarding repeating the
4 ride over and over again without waiting) that the DAS system is in any way
5 deficient in providing the level of accommodation required by law.

6 103. Disney admits that it has knowledge and experience in accommodating
7 guests with cognitive impairments but Disney lacks sufficient information or belief
8 to admit or deny the allegations in Paragraph 103 of the Complaint, and on that basis
9 denies them, except that it expressly denies the second half of the second sentence of
10 this paragraph.

11 104. Disney denies the allegations in the first sentence of Paragraph 104 of
12 the Complaint. Disney lacks sufficient information or belief to admit or deny the
13 allegations in the second sentence of Paragraph 104 of the Complaint, and on that
14 basis denies them, but Disney specifically denies the reference to what “other autistic
15 persons” are capable of.

16 105. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 105 of the Complaint, and on that basis denies them.

18 106. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 106 of the Complaint, and on that basis denies them.

20 107. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 107 of the Complaint, and on that basis denies them, except
22 that Disney expressly denies the allegations in the last two sentences of this
23 paragraph.

24 108. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 108 of the Complaint, and on that basis denies them.

26 109. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 109 of the Complaint, and on that basis denies them.

28 110. Disney denies the allegations in the first sentence of Paragraph 110 of

1 the Complaint. Disney lacks sufficient information or belief to admit or deny the
2 allegations in the second sentence of Paragraph 110 of the Complaint, and on that
3 basis denies them. Disney denies the remaining allegations of this paragraph. The
4 Prayer for Relief following Paragraph 110 of the Complaint contains no factual
5 assertions to which Disney is required to respond. To the extent the Prayer for Relief
6 may be deemed to require a response, Disney denies each and every allegation in this
7 paragraph (as well as the subparagraphs therein), and denies that an injunction,
8 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
9 appropriate or required.

10 111. Disney reincorporates its answers to Paragraphs 1 through 66 and 94
11 through 110 of the Complaint as though fully set forth herein in response to
12 Paragraph 111 of the Complaint.

13 112. The allegations of Paragraph 112 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it lacks sufficient information or belief to admit or
16 deny the allegations in Paragraph 112 of the Complaint, and on that basis denies
17 them.

18 113. Disney denies each and every allegation in Paragraph 113 of the
19 Complaint.

20 114. Disney denies the allegations in Paragraph 114 of the Complaint. The
21 Prayer for Relief following Paragraph 114 of the Complaint contains no factual
22 assertions to which Disney is required to respond. To the extent the Prayer for Relief
23 may be deemed to require a response, Disney denies each and every allegation in this
24 paragraph (as well as the subparagraphs therein), and denies that economic monetary
25 damages, litigation costs, prejudgment interest, or any other relief sought is
26 appropriate or required.

27 115. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
28 the Complaint as though fully set forth herein in response to Paragraph 115 of the

1 Complaint.

2 116. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 116 of the Complaint, and on that basis denies them.

4 117. The allegations of Paragraph 117 of the Complaint constitute
5 conclusions of law to which Disney is not required to respond. To the extent that
6 Disney is required to respond, it lacks sufficient information or belief to admit or
7 deny the allegations in Paragraph 117 of the Complaint, and on that basis denies
8 them.

9 118. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 118 of the Complaint, and on that basis denies them.

11 119. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 119 of the Complaint.

13 120. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 120 of the Complaint.

15 121. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 121 of the Complaint, and on that basis denies them.

17 122. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 122 of the Complaint, and on that basis denies them, but
19 Disney specifically denies the reference to what “other autistic persons” are capable
20 of.

21 123. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 123 of the Complaint, and on that basis denies them.

23 124. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 124 of the Complaint, and on that basis denies them, but
25 specifically denies any implication that the DAS system is “widely-despised.”

26 125. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 125 of the Complaint, and on that basis denies them.

28 126. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 126 of the Complaint, and on that basis denies them.

2 127. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 127 of the Complaint, and on that basis denies them.

4 128. Disney admits that MagicBands can be used to access rides in
5 connection with Disney's FASTPASS service and re-admission passes. Disney lacks
6 sufficient information or belief to admit or deny the remaining allegations in
7 Paragraph 128 of the Complaint, and on that basis denies them.

8 129. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 129 of the Complaint, and on that basis denies them.

10 130. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 130 of the Complaint, and on that basis denies them.

12 131. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 131 of the Complaint, and on that basis denies them.

14 132. Disney denies the allegations in Paragraph 132 of the Complaint.

15 133. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 133 of the Complaint, and on that basis denies them, except
17 that Disney expressly denies the allegation and/or implication in the eighth sentence
18 of this paragraph that a wheelchair is the only accommodation for guests with
19 mobility impairments.

20 134. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 134 of the Complaint, and on that basis denies them.

22 135. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 135 of the Complaint, and on that basis denies them, but
24 specifically denies any implication that Disney does not work individually with
25 guests with disabilities to provide assistance that is responsive to their circumstances.

26 136. Disney denies the allegations in the first part of the first sentence and in
27 the third and fifth sentences of Paragraph 136 of the Complaint, but lacks sufficient
28 information or belief to admit or deny the remaining allegations in this paragraph,

1 and on that basis denies them.

2 137. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 137 of the Complaint, and on that basis denies them.

4 138. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 138 of the Complaint, and on that basis denies them.

6 139. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 139 of the Complaint, and on that basis denies them.

8 140. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 140 of the Complaint, and on that basis denies them.

10 141. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 141 of the Complaint, and on that basis denies them, except
12 that Disney expressly denies the allegation and/or implication in the first sentence of
13 this paragraph that Disney failed to accommodate Plaintiff.

14 142. Disney lacks sufficient information or belief to admit or deny the
15 allegations in the first sentence of Paragraph 142 of the Complaint, and on that basis
16 denies them, except that Disney expressly denies the implication that any cast
17 member acted “so unwelcomingly and uncaringly” toward S.L.K. and her family.
18 Disney denies the allegation and/or implication in the second sentence of this
19 paragraph that it failed to accommodate Plaintiff, but admits that all guests with
20 disabilities are provided the level of accommodation required by law.

21 143. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 143 of the Complaint, and on that basis denies them.

23 144. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 144 of the Complaint, and on that basis denies them.

25 145. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 145 of the Complaint, and on that basis denies them.

27 146. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 146 of the Complaint, and on that basis denies them, except

1 that Disney expressly denies the allegation and/or implication in the first two
2 sentences of this paragraph that it failed to accommodate Plaintiff. Disney also
3 denies the implication in the third sentence of this paragraph that any cast member
4 treated S.L.K. or S.J.K. in a way that was “unfeeling” or “relentlessly uncaring”
5 toward them.

6 147. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 147 of the Complaint, and on that basis denies them, except
8 that Disney expressly denies the allegation and/or implication in this paragraph that
9 it failed to accommodate Plaintiff.

10 148. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 148 of the Complaint, and on that basis denies them.

12 149. Disney denies each and every allegation in Paragraph 149 of the
13 Complaint.

14 150. Disney denies each and every allegation in Paragraph 150 of the
15 Complaint. The Prayer for Relief following Paragraph 150 of the Complaint
16 contains no factual assertions to which Disney is required to respond. To the extent
17 the Prayer for Relief may be deemed to require a response, Disney denies each and
18 every allegation in this paragraph (as well as the subparagraphs therein), and denies
19 that an injunction, remedial measures, attorneys’ fees, litigation costs, or any other
20 relief sought is appropriate or required.

21 151. Disney reincorporates its answers to Paragraphs 1 through 66 and 116
22 through 150 of the Complaint as though fully set forth herein in response to
23 Paragraph 151 of the Complaint.

24 152. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 152 of the Complaint, and on that basis denies them.

26 153. The allegations of Paragraph 153 of the Complaint constitute
27 conclusions of law to which Disney is not required to respond. To the extent that
28 Disney is required to respond, it denies each and every allegation in this paragraph.

1 154. The allegations of Paragraph 154 of the Complaint constitute
2 conclusions of law to which Disney is not required to respond. To the extent that
3 Disney is required to respond, it denies each and every allegation in this paragraph.

4 155. The allegations of Paragraph 155 of the Complaint constitute
5 conclusions of law to which Disney is not required to respond. To the extent that
6 Disney is required to respond, it denies each and every allegation in this paragraph.
7 The Prayer for Relief following Paragraph 155 of the Complaint contains no factual
8 assertions to which Disney is required to respond. To the extent the Prayer for Relief
9 may be deemed to require a response, Disney denies each and every allegation in this
10 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
11 litigation costs, prejudgment interest or any other relief sought is appropriate or
12 required.

13 156. Disney reincorporates its answers to Paragraphs 1 through 66 and 116
14 through 150 of the Complaint as though fully set forth herein in response to
15 Paragraph 156 of the Complaint.

16 157. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 157 of the Complaint, and on that basis denies them.

18 158. The allegations of Paragraph 158 of the Complaint constitute
19 conclusions of law to which Disney is not required to respond. To the extent that
20 Disney is required to respond, it denies each and every allegation in this paragraph.

21 159. The allegations of Paragraph 159 of the Complaint constitute
22 conclusions of law to which Disney is not required to respond. To the extent that
23 Disney is required to respond, it denies each and every allegation in this paragraph.

24 160. The allegations of Paragraph 160 of the Complaint constitute
25 conclusions of law to which Disney is not required to respond. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph.
27 The Prayer for Relief following Paragraph 160 of the Complaint contains no factual
28 assertions to which Disney is required to respond. To the extent the Prayer for Relief

1 may be deemed to require a response, Disney denies each and every allegation in this
2 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
3 litigation costs, prejudgment interest or any other relief sought is appropriate or
4 required.

5 161. Disney reincorporates its answers to Paragraphs 1 through 66 and 116
6 through 150 of the Complaint as though fully set forth herein in response to
7 Paragraph 161 of the Complaint.

8 162. The allegations of Paragraph 162 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it lacks sufficient information or belief to admit or
11 deny the allegations in Paragraph 162 of the Complaint, and on that basis denies
12 them.

13 163. Disney denies each and every allegation in Paragraph 163 of the
14 Complaint.

15 164. Disney denies the allegations in Paragraph 164 of the Complaint. The
16 Prayer for Relief following Paragraph 164 of the Complaint contains no factual
17 assertions to which Disney is required to respond. To the extent the Prayer for Relief
18 may be deemed to require a response, Disney denies each and every allegation in this
19 paragraph (as well as the subparagraphs therein), and denies that economic monetary
20 damages, litigation costs, prejudgment interest, or any other relief sought is
21 appropriate or required.

22 165. Disney reincorporates its answers to Paragraphs 1 through 66 and 116
23 through 150 of the Complaint as though fully set forth herein in response to
24 Paragraph 165 of the Complaint.

25 166. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 166 of the Complaint, and on that basis denies them.

27 167. The allegations of Paragraph 167 of the Complaint constitute
28 conclusions of law to which Disney is not required to respond. To the extent that

1 Disney is required to respond, it denies each and every allegation in this paragraph.

2 168. The allegations of Paragraph 168 of the Complaint constitute
3 conclusions of law to which Disney is not required to respond. To the extent that
4 Disney is required to respond, it denies each and every allegation in this paragraph.

5 169. Disney lacks sufficient information or belief to admit or deny the
6 allegations in the first sentence of Paragraph 169 of the Complaint, and on that basis
7 denies them. The remaining allegations of Paragraph 169 of the Complaint
8 constitute conclusions of law to which Disney is not required to respond. To the
9 extent that Disney is required to respond, it denies each and every allegation in this
10 paragraph.

11 170. The allegations of Paragraph 170 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.
14 The Prayer for Relief following Paragraph 170 of the Complaint contains no factual
15 assertions to which Disney is required to respond. To the extent the Prayer for Relief
16 may be deemed to require a response, Disney denies each and every allegation in this
17 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
18 litigation costs, prejudgment interest or any other relief sought is appropriate or
19 required.

20 171. Disney reincorporates its answers to Paragraphs 1 through 66 and 116
21 through 150 of the Complaint as though fully set forth herein in response to
22 Paragraph 171 of the Complaint.

23 172. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 172 of the Complaint, and on that basis denies them.

25 173. The allegations of Paragraph 173 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it denies each and every allegation in this paragraph.

28 174. The allegations of Paragraph 174 of the Complaint constitute

1 conclusions of law to which Disney is not required to respond. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph.

3 175. Disney lacks sufficient information or belief to admit or deny the
4 allegations in the first sentence of Paragraph 175 of the Complaint, and on that basis
5 denies them. The remaining allegations of Paragraph 175 of the Complaint
6 constitute conclusions of law to which Disney is not required to respond. To the
7 extent that Disney is required to respond, it denies each and every allegation in this
8 paragraph.

9 176. The allegations of Paragraph 176 of the Complaint constitute
10 conclusions of law to which Disney is not required to respond. To the extent that
11 Disney is required to respond, it denies each and every allegation in this paragraph.
12 The Prayer for Relief following Paragraph 176 of the Complaint contains no factual
13 assertions to which Disney is required to respond. To the extent the Prayer for Relief
14 may be deemed to require a response, Disney denies each and every allegation in this
15 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
16 litigation costs, prejudgment interest or any other relief sought is appropriate or
17 required.

18 177. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
19 the Complaint as though fully set forth herein in response to Paragraph 177 of the
20 Complaint.

21 178. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 178 of the Complaint, and on that basis denies them.

23 179. The allegations of Paragraph 179 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it lacks sufficient information or belief to admit or
26 deny the allegations in Paragraph 179 of the Complaint, and on that basis denies
27 them.

28 180. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 180 of the Complaint, and on that basis denies them.

2 181. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 181 of the Complaint.

4 182. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 182 of the Complaint, and on that basis denies them.

6 183. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 183 of the Complaint, and on that basis denies them.

8 184. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 184 of the Complaint, and on that basis denies them.

10 185. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 185 of the Complaint, and on that basis denies them.

12 186. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 186 of the Complaint, and on that basis denies them, except
14 Disney admits that it works individually with guests with disabilities to provide
15 assistance that is responsive to their circumstances.

16 187. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 187 of the Complaint, and on that basis denies them, except
18 that Disney specifically denies (with respect to the allegation regarding repeating the
19 ride over and over again without waiting) that the DAS system is in any way
20 deficient in providing the level of accommodation required by law.

21 188. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 188 of the Complaint, and on that basis denies them.

23 189. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 189 of the Complaint, and on that basis denies them.

25 190. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 190 of the Complaint, and on that basis denies them, except
27 that Disney expressly denies the implication in this sentence that Disney was “very
28 accommodating” only before October 9, 2013 and denies any implication that

1 Disney failed to accommodate A.B.

2 191. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 191 of the Complaint, and on that basis denies them, except
4 that Disney expressly denies any implication that it failed to accommodate persons
5 with disabilities.

6 192. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 192 of the Complaint, and on that basis denies them, but
8 specifically denies any implication that the DAS system is “widely-despised.”

9 193. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 193 of the Complaint, and on that basis denies them, but
11 Disney specifically denies any attempt to characterize the name of the DAS card, and
12 denies any implication that cast members do not work with guests individually to
13 assess their request for assistance or that they refuse to review medical
14 documentation that guests provide to them.

15 194. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 194 of the Complaint, and on that basis denies them.

17 195. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 195 of the Complaint, and on that basis denies them.

19 196. Disney lacks sufficient information or belief to admit or deny the
20 allegations in the first sentence of Paragraph 196 of the Complaint, and on that basis
21 denies them, except that Disney expressly denies the implication in this sentence that
22 A.B. was accommodated on the “It’s a Small World” ride only before October 9,
23 2013.

24 197. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 197 of the Complaint, and on that basis denies them, except
26 that Disney denies the allegation that A.B. was treated “as a second-class guest.”

27 198. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 198 of the Complaint, and on that basis denies them.

1 200. Disney lacks sufficient information or belief to admit or deny the
2 allegations in the first sentence of Paragraph 199 of the Complaint, and on that basis
3 denies them. Disney denies the allegations in the second sentence of this paragraph.
4 Disney lacks sufficient information or belief to admit or deny the allegations in the
5 third and fourth sentences of Paragraph 199 of the Complaint, and on that basis
6 denies them.

7 200. Disney lacks sufficient information or belief to admit or deny the
8 allegations in the first sentence of Paragraph 200 of the Complaint, and on that basis
9 denies them. Disney denies the allegations in the second and third sentences of this
10 paragraph. Disney lacks sufficient information or belief to admit or deny the
11 allegations in the fourth sentence of Paragraph 200 of the Complaint, and on that
12 basis denies them. Disney denies the remaining allegations of this paragraph. The
13 Prayer for Relief following Paragraph 200 of the Complaint contains no factual
14 assertions to which Disney is required to respond. To the extent the Prayer for Relief
15 may be deemed to require a response, Disney denies each and every allegation in this
16 paragraph (as well as the subparagraphs therein), and denies that an injunction,
17 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
18 appropriate or required.

19 201. Disney reincorporates its answers to Paragraphs 1 through 66 and 178
20 through 200 of the Complaint as though fully set forth herein in response to
21 Paragraph 201 of the Complaint.

22 202. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 202 of the Complaint, and on that basis denies them.

24 203. The allegations of Paragraph 203 of the Complaint constitute
25 conclusions of law to which Disney is not required to respond. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph.

27 204. The allegations of Paragraph 204 of the Complaint constitute
28 conclusions of law to which Disney is not required to respond. To the extent that

1 Disney is required to respond, it denies each and every allegation in this paragraph.

2 205. The allegations of Paragraph 205 of the Complaint constitute
3 conclusions of law to which Disney is not required to respond. To the extent that
4 Disney is required to respond, it denies each and every allegation in this paragraph.
5 The Prayer for Relief following Paragraph 205 of the Complaint contains no factual
6 assertions to which Disney is required to respond. To the extent the Prayer for Relief
7 may be deemed to require a response, Disney denies each and every allegation in this
8 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
9 litigation costs, prejudgment interest or any other relief sought is appropriate or
10 required.

11 206. Disney reincorporates its answers to Paragraphs 1 through 66 and 178
12 through 200 of the Complaint as though fully set forth herein in response to
13 Paragraph 206 of the Complaint.

14 207. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 207 of the Complaint, and on that basis denies them.

16 208. The allegations of Paragraph 208 of the Complaint constitute
17 conclusions of law to which Disney is not required to respond. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph.

19 209. The allegations of Paragraph 209 of the Complaint constitute
20 conclusions of law to which Disney is not required to respond. To the extent that
21 Disney is required to respond, it denies each and every allegation in this paragraph.

22 210. The allegations of Paragraph 210 of the Complaint constitute
23 conclusions of law to which Disney is not required to respond. To the extent that
24 Disney is required to respond, it denies each and every allegation in this paragraph.
25 The Prayer for Relief following Paragraph 210 of the Complaint contains no factual
26 assertions to which Disney is required to respond. To the extent the Prayer for Relief
27 may be deemed to require a response, Disney denies each and every allegation in this
28 paragraph (as well as the subparagraphs therein), and denies that monetary damages,

1 litigation costs, prejudgment interest or any other relief sought is appropriate or
2 required.

3 211. Disney reincorporates its answers to Paragraphs 1 through 66 and 178
4 through 200 of the Complaint as though fully set forth herein in response to
5 Paragraph 211 of the Complaint.

6 212. The allegations of Paragraph 212 of the Complaint constitute
7 conclusions of law to which Disney is not required to respond. To the extent that
8 Disney is required to respond, it lacks sufficient information or belief to admit or
9 deny the allegations in Paragraph 212 of the Complaint, and on that basis denies
10 them.

11 213. Disney denies each and every allegation in Paragraph 213 of the
12 Complaint.

13 214. Disney denies the allegations in Paragraph 214 of the Complaint. The
14 Prayer for Relief following Paragraph 214 of the Complaint contains no factual
15 assertions to which Disney is required to respond. To the extent the Prayer for Relief
16 may be deemed to require a response, Disney denies each and every allegation in this
17 paragraph (as well as the subparagraphs therein), and denies that economic monetary
18 damages, litigation costs, prejudgment interest, or any other relief sought is
19 appropriate or required.

20 215. Disney reincorporates its answers to Paragraphs 1 through 66 and 178
21 through 200 of the Complaint as though fully set forth herein in response to
22 Paragraph 215 of the Complaint.

23 216. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 216 of the Complaint, and on that basis denies them.

25 217. The allegations of Paragraph 217 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it denies each and every allegation in this paragraph.

28 218. The allegations of Paragraph 218 of the Complaint constitute

1 conclusions of law to which Disney is not required to respond. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph.

3 219. Disney lacks sufficient information or belief to admit or deny the
4 allegations in the first sentence of Paragraph 219 of the Complaint, and on that basis
5 denies them. The remaining allegations of Paragraph 219 of the Complaint
6 constitute conclusions of law to which Disney is not required to respond. To the
7 extent that Disney is required to respond, it denies each and every allegation in this
8 paragraph.

9 220. The allegations of Paragraph 220 of the Complaint constitute
10 conclusions of law to which Disney is not required to respond. To the extent that
11 Disney is required to respond, it denies each and every allegation in this paragraph.
12 The Prayer for Relief following Paragraph 220 of the Complaint contains no factual
13 assertions to which Disney is required to respond. To the extent the Prayer for Relief
14 may be deemed to require a response, Disney denies each and every allegation in this
15 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
16 litigation costs, prejudgment interest or any other relief sought is appropriate or
17 required.

18 221. Disney reincorporates its answers to Paragraphs 1 through 66 and 178
19 through 200 of the Complaint as though fully set forth herein in response to
20 Paragraph 221 of the Complaint.

21 222. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 222 of the Complaint, and on that basis denies them.

23 223. The allegations of Paragraph 223 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it denies each and every allegation in this paragraph.

26 224. The allegations of Paragraph 224 of the Complaint constitute
27 conclusions of law to which Disney is not required to respond. To the extent that
28 Disney is required to respond, it denies each and every allegation in this paragraph.

1 225. Disney lacks sufficient information or belief to admit or deny the
2 allegations in the first sentence of Paragraph 225 of the Complaint, and on that basis
3 denies them. The remaining allegations of Paragraph 225 of the Complaint
4 constitute conclusions of law to which Disney is not required to respond. To the
5 extent that Disney is required to respond, it denies each and every allegation in this
6 paragraph.

7 226. The allegations of Paragraph 226 of the Complaint constitute
8 conclusions of law to which Disney is not required to respond. To the extent that
9 Disney is required to respond, it denies each and every allegation in this paragraph.
10 The Prayer for Relief following Paragraph 226 of the Complaint contains no factual
11 assertions to which Disney is required to respond. To the extent the Prayer for Relief
12 may be deemed to require a response, Disney denies each and every allegation in this
13 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
14 litigation costs, prejudgment interest or any other relief sought is appropriate or
15 required.

16 227. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
17 the Complaint as though fully set forth herein in response to Paragraph 227 of the
18 Complaint.

19 228. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 228 of the Complaint, and on that basis denies them.

21 229. The allegations of Paragraph 229 of the Complaint constitute
22 conclusions of law to which Disney is not required to respond. To the extent that
23 Disney is required to respond, it lacks sufficient information or belief to admit or
24 deny the allegations in Paragraph 229 of the Complaint, and on that basis denies
25 them.

26 230. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 230 of the Complaint, and on that basis denies them.

28 231. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 231 of the Complaint.

2 232. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 232 of the Complaint, and on that basis denies them, except
4 that Disney specifically denies any implication that D.H. was “admirably
5 accommodated” only before October 9, 2013.

6 233. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 233 of the Complaint, and on that basis denies them.

8 234. Disney lacks sufficient information or belief to admit or deny the
9 allegations in the first sentence of Paragraph 234 of the Complaint, and on that basis
10 denies them. Disney denies the allegations in the second, third and fourth sentences
11 of this paragraph. Disney lacks sufficient information or belief to admit or deny the
12 allegations in the fifth sentence of Paragraph 234 of the Complaint, and on that basis
13 denies them.

14 235. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 235 of the Complaint, and on that basis denies them, except
16 that Disney specifically denies (with respect to the allegation regarding repeating the
17 ride over and over again or riding them in a particular order without waiting) that the
18 DAS system is in any way deficient in providing the level of accommodation
19 required by law.

20 236. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 236 of the Complaint, and on that basis denies them, except
22 that Disney specifically denies (with respect to the allegation regarding repeating the
23 ride over and over again or riding them in a particular order without waiting) that the
24 DAS system is in any way deficient in providing the level of accommodation
25 required by law.

26 237. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 237 of the Complaint, and on that basis denies them.

28 238. Disney lacks sufficient information or belief to admit or deny the

1 allegations in the first two sentences of Paragraph 238 of the Complaint, and on that
2 basis denies them. Disney does not understand what is meant by “one-time
3 disability” and on that basis denies the allegation in the third and fourth sentences of
4 this paragraph. Disney denies the allegations in the fifth and sixth sentences of
5 Paragraph 238 of the Complaint.

6 239. Disney denies the allegations in Paragraph 239 of the Complaint except
7 that Disney admits that it has knowledge and experience in accommodating guests
8 with cognitive impairments and that it has a long-standing, unwavering commitment
9 to providing a welcoming and inclusive environment and accessible experience for
10 guests with disabilities.

11 240. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 240 of the Complaint, and on that basis denies them, except
13 that Disney expressly denies the allegation in the second part of the second sentence
14 of this paragraph, and denies that Disney treated D.H. in a way that would cause him
15 to feel embarrassed or stigmatized.

16 241. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 241 of the Complaint, and on that basis denies them, except
18 that Disney expressly denies the allegation and/or implication in the second sentence
19 of this paragraph that J.H. and D.H. were “actually accommodated” only with the
20 GAC.

21 242. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 242 of the Complaint, and on that basis denies them, except
23 that Disney expressly denies the allegation and/or implication in the first sentence of
24 this paragraph that “J.H. was induced to purchase a Disney Vacation Club property.”
25 The Prayer for Relief following Paragraph 242 of the Complaint contains no factual
26 assertions to which Disney is required to respond. To the extent the Prayer for Relief
27 may be deemed to require a response, Disney denies each and every allegation in this
28 paragraph (as well as the subparagraphs therein), and denies that an injunction,

1 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
2 appropriate or required.

3 243. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
4 the Complaint as though fully set forth herein in response to Paragraph 243 of the
5 Complaint.

6 244. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 244 of the Complaint, and on that basis denies them.

8 245. The allegations of Paragraph 245 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it lacks sufficient information or belief to admit or
11 deny the allegations in Paragraph 245 of the Complaint, and on that basis denies
12 them.

13 246. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 246 of the Complaint, and on that basis denies them.

15 247. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 247 of the Complaint.

17 248. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 248 of the Complaint, and on that basis denies them.

19 249. Disney lacks sufficient information or belief to admit or deny the
20 allegations in the first sentence of Paragraph 249 of the Complaint, and on that basis
21 denies them, except that Disney expressly denies the implication in this sentence that
22 J.M. was "admirably accommodated" only before October 9, 2013. Disney admits
23 that the GAC was initially valid for up to 14 days and that Disney subsequently made
24 them available for up to 60 days, but denies any other allegations and/or implications
25 in the second sentence of Paragraph 249 of the Complaint. Disney lacks sufficient
26 information or belief to admit or deny the remaining allegations in Paragraph 249 of
27 the Complaint, and on that basis denies them.

28 250. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 250 of the Complaint, and on that basis denies them.

2 251. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 251 of the Complaint, and on that basis denies them.

4 252. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 252 of the Complaint, and on that basis denies them.

6 253. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 253 of the Complaint, and on that basis denies them.

8 254. Disney denies each and every allegation in Paragraph 254 of the
9 Complaint.

10 255. Disney lacks sufficient information or belief to admit or deny the
11 allegations in the first two sentences of Paragraph 255 of the Complaint, and on that
12 basis denies them. Disney denies the remaining allegations in Paragraph 255 of the
13 Complaint.

14 256. Disney lacks sufficient information or belief to admit or deny the
15 allegations in the first two sentences of Paragraph 256 of the Complaint, and on that
16 basis denies them. Disney denies the remaining allegations in Paragraph 256 of the
17 Complaint.

18 257. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 257 of the Complaint, and on that basis denies them, but
20 Disney specifically denies that any cast member treated E.M. or her children in a
21 way that would cause them to feel insulted or disturbed.

22 258. Disney lacks sufficient information or belief to admit or deny the
23 allegations in the first sentence of Paragraph 258 of the Complaint, and on that basis
24 denies them. Disney denies the first part of the second sentence of Paragraph 258 of
25 the Complaint and lacks sufficient information or belief to admit or deny the
26 allegations in the second part of the second sentence of this paragraph, and on that
27 basis denies them.

28 259. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 259 of the Complaint, and on that basis denies them, except
2 that Disney expressly denies the allegation and/or implication in the second sentence
3 of this paragraph that E.M. was not “properly accommodated” during her November
4 2013 visit to Walt Disney World.

5 260. Disney states that the correspondence dated December 7, 2013 and
6 December 13, 2013 speak for themselves, and that any attempt to characterize them
7 is expressly denied.

8 261. Disney denies each and every allegation in Paragraph 261 of the
9 Complaint.

10 262. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 262 of the Complaint, and on that basis denies them, except
12 that Disney specifically denies any implication that the DAS system deters guests
13 with disabilities from visiting Disney’s theme parks.

14 263. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 263 of the Complaint, and on that basis denies them, except
16 that Disney expressly denies the allegation in the third sentence of this paragraph that
17 “Disney policy does not permit disabled persons to plan in advance of a trip.”

18 264. Disney denies the allegations in Paragraph 264 of the Complaint.

19 265. Disney denies each and every allegation in Paragraph 265 of the
20 Complaint.

21 266. Disney lacks sufficient information or belief to admit or deny the
22 allegations in the first and third sentences and the first part of the fourth sentence of
23 Paragraph 266 of the Complaint, and on that basis denies them. Disney denies the
24 allegations in the second sentence and in the second part of the fourth sentence of
25 this paragraph.

26 267. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 267 of the Complaint, and on that basis denies them, except
28 that Disney expressly denies the allegation and/or implication in the first sentence of

1 this paragraph that E.M. was “actually accommodated” only with the GAC. The
2 Prayer for Relief following Paragraph 267 of the Complaint contains no factual
3 assertions to which Disney is required to respond. To the extent the Prayer for Relief
4 may be deemed to require a response, Disney denies each and every allegation in this
5 paragraph (as well as the subparagraphs therein), and denies that an injunction,
6 remedial measures, attorneys’ fees, litigation costs, or any other relief sought is
7 appropriate or required.

8 268. Disney reincorporates its answers to Paragraphs 1 through 66 and 244
9 through 267 of the Complaint as though fully set forth herein in response to
10 Paragraph 268 of the Complaint.

11 269. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 269 of the Complaint, and on that basis denies them.

13 270. The allegations of Paragraph 270 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it denies each and every allegation in this paragraph.

16 271. The allegations of Paragraph 271 of the Complaint constitute
17 conclusions of law to which Disney is not required to respond. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph.

19 272. The allegations of Paragraph 272 of the Complaint constitute
20 conclusions of law to which Disney is not required to respond. To the extent that
21 Disney is required to respond, it denies each and every allegation in this paragraph.
22 The Prayer for Relief following Paragraph 272 of the Complaint contains no factual
23 assertions to which Disney is required to respond. To the extent the Prayer for Relief
24 may be deemed to require a response, Disney denies each and every allegation in this
25 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
26 litigation costs, prejudgment interest or any other relief sought is appropriate or
27 required.

28 273. Disney reincorporates its answers to Paragraphs 1 through 66 and 244

1 through 267 of the Complaint as though fully set forth herein in response to
2 Paragraph 273 of the Complaint.

3 274. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 274 of the Complaint, and on that basis denies them.

5 275. The allegations of Paragraph 275 of the Complaint constitute
6 conclusions of law to which Disney is not required to respond. To the extent that
7 Disney is required to respond, it denies each and every allegation in this paragraph.

8 276. The allegations of Paragraph 276 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph.

11 277. The allegations of Paragraph 277 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.
14 The Prayer for Relief following Paragraph 277 of the Complaint contains no factual
15 assertions to which Disney is required to respond. To the extent the Prayer for Relief
16 may be deemed to require a response, Disney denies each and every allegation in this
17 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
18 litigation costs, prejudgment interest or any other relief sought is appropriate or
19 required.

20 278. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
21 the Complaint as though fully set forth herein in response to Paragraph 278 of the
22 Complaint.

23 279. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 279 of the Complaint, and on that basis denies them.

25 280. The allegations of Paragraph 280 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it lacks sufficient information or belief to admit or
28 deny the allegations in Paragraph 280 of the Complaint, and on that basis denies

1 them.

2 281. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 281 of the Complaint, and on that basis denies them.

4 282. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 282 of the Complaint.

6 283. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 283 of the Complaint, and on that basis denies them.

8 284. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 284 of the Complaint, and on that basis denies them, except
10 that Disney specifically denies any implication that S.M. was “admirably
11 accommodated” only before October 9, 2013.

12 285. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 285 of the Complaint, and on that basis denies them.

14 286. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 286 of the Complaint, and on that basis denies them.

16 287. Disney denies each and every allegation in Paragraph 287 of the
17 Complaint.

18 288. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 288 of the Complaint, and on that basis denies them, but
20 Disney specifically denies the reference to what is “common among autistic persons”
21 and denies (with respect to the allegation regarding repeating the ride over and over
22 again without waiting) that the DAS system is in any way deficient in providing the
23 level of accommodation required by law.

24 289. Disney lacks sufficient information or belief to admit or deny the
25 allegations in the first two sentences of Paragraph 289 of the Complaint, and on that
26 basis denies them. Disney denies the remaining allegations in Paragraph 289 of the
27 Complaint.

28 290. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 290 of the Complaint, and on that basis denies them.

2 291. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 291 of the Complaint, and on that basis denies them, but
4 Disney specifically denies that any cast member treated E.M. or her children in a
5 way that would cause them to feel insulted or disturbed.

6 292. Disney lacks sufficient information or belief to admit or deny the
7 allegations in the first sentence of Paragraph 292 of the Complaint, and on that basis
8 denies them. Disney denies the first part of the second sentence of Paragraph 292 of
9 the Complaint and lacks sufficient information or belief to admit or deny the
10 allegations in the second part of the second sentence of this paragraph, and on that
11 basis denies them.

12 293. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 293 of the Complaint, and on that basis denies them, except
14 that Disney expressly denies the allegation and/or implication in the second sentence
15 of this paragraph that E.M. was not “properly accommodated” during her December
16 2013 visit to Walt Disney World.

17 294. Disney states that the correspondence dated December 7, 2013 and
18 December 13, 2013 speak for themselves, and that any attempt to characterize them
19 is expressly denied.

20 295. Disney denies each and every allegation in Paragraph 295 of the
21 Complaint.

22 296. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 296 of the Complaint, and on that basis denies them, except
24 that Disney specifically denies any implication that the DAS system deters guests
25 with disabilities from visiting Disney’s theme parks.

26 297. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 297 of the Complaint, and on that basis denies them, except
28 that Disney expressly denies the allegation in the third sentence of this paragraph that

1 “Disney policy does not permit disabled persons to plan in advance of a trip.”

2 298. Disney denies the allegations in Paragraph 298 of the Complaint.

3 299. Disney denies each and every allegation in Paragraph 299 of the
4 Complaint.

5 300. Disney lacks sufficient information or belief to admit or deny the
6 allegations in the first and third sentences and the first part of the fourth sentence of
7 Paragraph 300 of the Complaint, and on that basis denies them. Disney denies the
8 allegations in the second sentence and in the second part of the fourth sentence of
9 this paragraph.

10 301. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 301 of the Complaint, and on that basis denies them, except
12 that Disney expressly denies the allegation and/or implication in the first sentence of
13 this paragraph that E.M. was “actually accommodated” only with the GAC. The
14 Prayer for Relief following Paragraph 301 of the Complaint contains no factual
15 assertions to which Disney is required to respond. To the extent the Prayer for Relief
16 may be deemed to require a response, Disney denies each and every allegation in this
17 paragraph (as well as the subparagraphs therein), and denies that an injunction,
18 remedial measures, attorneys’ fees, litigation costs, or any other relief sought is
19 appropriate or required.

20 302. Disney reincorporates its answers to Paragraphs 1 through 66 and 279
21 through 301 of the Complaint as though fully set forth herein in response to
22 Paragraph 302 of the Complaint.

23 303. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 303 of the Complaint, and on that basis denies them.

25 304. The allegations of Paragraph 304 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it denies each and every allegation in this paragraph.

28 305. The allegations of Paragraph 305 of the Complaint constitute

1 conclusions of law to which Disney is not required to respond. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph.

3 306. The allegations of Paragraph 306 of the Complaint constitute
4 conclusions of law to which Disney is not required to respond. To the extent that
5 Disney is required to respond, it denies each and every allegation in this paragraph.
6 The Prayer for Relief following Paragraph 306 of the Complaint contains no factual
7 assertions to which Disney is required to respond. To the extent the Prayer for Relief
8 may be deemed to require a response, Disney denies each and every allegation in this
9 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
10 litigation costs, prejudgment interest or any other relief sought is appropriate or
11 required.

12 307. Disney reincorporates its answers to Paragraphs 1 through 66 and 279
13 through 301 of the Complaint as though fully set forth herein in response to
14 Paragraph 307 of the Complaint.

15 308. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 308 of the Complaint, and on that basis denies them.

17 309. The allegations of Paragraph 309 of the Complaint constitute
18 conclusions of law to which Disney is not required to respond. To the extent that
19 Disney is required to respond, it denies each and every allegation in this paragraph.

20 310. The allegations of Paragraph 310 of the Complaint constitute
21 conclusions of law to which Disney is not required to respond. To the extent that
22 Disney is required to respond, it denies each and every allegation in this paragraph.

23 311. The allegations of Paragraph 311 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it denies each and every allegation in this paragraph.
26 The Prayer for Relief following Paragraph 311 of the Complaint contains no factual
27 assertions to which Disney is required to respond. To the extent the Prayer for Relief
28 may be deemed to require a response, Disney denies each and every allegation in this

1 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
2 litigation costs, prejudgment interest or any other relief sought is appropriate or
3 required.

4 312. Disney reincorporates its answers to Paragraphs 1 through 66, 244
5 through 267 and 279 through 301 of the Complaint as though fully set forth herein in
6 response to Paragraph 312 of the Complaint.

7 313. The allegations of Paragraph 313 of the Complaint constitute
8 conclusions of law to which Disney is not required to respond. To the extent that
9 Disney is required to respond, it lacks sufficient information or belief to admit or
10 deny the allegations in Paragraph 313 of the Complaint, and on that basis denies
11 them.

12 314. Disney denies each and every allegation in Paragraph 314 of the
13 Complaint.

14 315. Disney denies the allegations in Paragraph 315 of the Complaint. The
15 Prayer for Relief following Paragraph 315 of the Complaint contains no factual
16 assertions to which Disney is required to respond. To the extent the Prayer for Relief
17 may be deemed to require a response, Disney denies each and every allegation in this
18 paragraph (as well as the subparagraphs therein), and denies that economic monetary
19 damages, litigation costs, prejudgment interest, or any other relief sought is
20 appropriate or required.

21 316. Disney reincorporates its answers to Paragraphs 1 through 66, 244
22 through 267 and 279 through 301 of the Complaint as though fully set forth herein in
23 response to Paragraph 316 of the Complaint.

24 317. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 317 of the Complaint, and on that basis denies them.

26 318. The allegations of Paragraph 318 of the Complaint constitute
27 conclusions of law to which Disney is not required to respond. To the extent that
28 Disney is required to respond, it denies each and every allegation in this paragraph.

1 319. The allegations of Paragraph 319 of the Complaint constitute
2 conclusions of law to which Disney is not required to respond. To the extent that
3 Disney is required to respond, it denies each and every allegation in this paragraph.

4 320. Disney lacks sufficient information or belief to admit or deny the
5 allegations in the first sentence of Paragraph 320 of the Complaint, and on that basis
6 denies them. The remaining allegations of Paragraph 320 of the Complaint
7 constitute conclusions of law to which Disney is not required to respond. To the
8 extent that Disney is required to respond, it denies each and every allegation in this
9 paragraph.

10 321. The allegations of Paragraph 321 of the Complaint constitute
11 conclusions of law to which Disney is not required to respond. To the extent that
12 Disney is required to respond, it denies each and every allegation in this paragraph.
13 The Prayer for Relief following Paragraph 321 of the Complaint contains no factual
14 assertions to which Disney is required to respond. To the extent the Prayer for Relief
15 may be deemed to require a response, Disney denies each and every allegation in this
16 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
17 litigation costs, prejudgment interest or any other relief sought is appropriate or
18 required.

19 322. Disney reincorporates its answers to Paragraphs 1 through 66, 244
20 through 267 and 279 through 301 of the Complaint as though fully set forth herein in
21 response to Paragraph 322 of the Complaint.

22 323. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 323 of the Complaint, and on that basis denies them.

24 324. The allegations of Paragraph 324 of the Complaint constitute
25 conclusions of law to which Disney is not required to respond. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph.

27 325. The allegations of Paragraph 325 of the Complaint constitute
28 conclusions of law to which Disney is not required to respond. To the extent that

1 Disney is required to respond, it denies each and every allegation in this paragraph.

2 326. Disney lacks sufficient information or belief to admit or deny the
3 allegations in the first sentence of Paragraph 326 of the Complaint, and on that basis
4 denies them. The remaining allegations of Paragraph 326 of the Complaint
5 constitute conclusions of law to which Disney is not required to respond. To the
6 extent that Disney is required to respond, it denies each and every allegation in this
7 paragraph.

8 327. The allegations of Paragraph 327 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph.
11 The Prayer for Relief following Paragraph 327 of the Complaint contains no factual
12 assertions to which Disney is required to respond. To the extent the Prayer for Relief
13 may be deemed to require a response, Disney denies each and every allegation in this
14 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
15 litigation costs, prejudgment interest or any other relief sought is appropriate or
16 required.

17 328. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
18 the Complaint as though fully set forth herein in response to Paragraph 328 of the
19 Complaint.

20 329. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 329 of the Complaint, and on that basis denies them.

22 330. The allegations of Paragraph 330 of the Complaint constitute
23 conclusions of law to which Disney is not required to respond. To the extent that
24 Disney is required to respond, it lacks sufficient information or belief to admit or
25 deny the allegations in Paragraph 330 of the Complaint, and on that basis denies
26 them.

27 331. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 331 of the Complaint, and on that basis denies them.

1 332. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 332 of the Complaint.

3 333. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 333 of the Complaint, and on that basis denies them.

5 334. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 334 of the Complaint, and on that basis denies them, except
7 that Disney specifically denies any implication that S.M. or J.K. was “admirably
8 accommodated” only before October 9, 2013.

9 335. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 335 of the Complaint, and on that basis denies them.

11 336. Disney lacks sufficient information or belief to admit or deny the
12 allegations in the first and second sentences of Paragraph 336 of the Complaint, and
13 on that basis denies them, except that Disney specifically denies any implication that
14 it did not accommodate J.K.

15 337. Disney lacks sufficient information or belief to admit or deny the
16 allegations in the first and second sentences of Paragraph 337 of the Complaint, and
17 on that basis denies them.

18 338. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 338 of the Complaint, and on that basis denies them.

20 339. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 339 of the Complaint, and on that basis denies them, except
22 that Disney specifically denies the reference to what is “common among autistic
23 persons.”

24 340. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 340 of the Complaint, and on that basis denies them.

26 341. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 341 of the Complaint, and on that basis denies them, except
28 that Disney specifically denies (with respect to the allegation regarding riding

1 specific rides in a particular order without waiting) that the DAS system is in any
2 way deficient in providing the level of accommodation required by law.

3 342. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 342 of the Complaint, and on that basis denies them.

5 343. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 343 of the Complaint, and on that basis denies them, except
7 that Disney expressly denies the allegation and/or implication in the second sentence
8 of this paragraph that Disney would not accommodate Plaintiff, and denies the
9 allegation that the DAS system would “impact” the autistic community.

10 344. Disney states that the email dated October 3, 2013 speaks for itself, and
11 that any attempt to characterize it is expressly denied. Disney denies the remaining
12 allegations in Paragraph 344 of the Complaint.

13 345. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 345 of the Complaint, and on that basis denies them, but
15 specifically denies any implication that there is widespread “disdain” for the DAS
16 system, and denies the allegation that the DAS system deters guests with disabilities
17 from visiting Disney’s theme parks.

18 346. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 346 of the Complaint, and on that basis denies them, except
20 that Disney expressly denies the allegation and/or implication in the second sentence
21 of this paragraph that J.K. and R.K. will likely have an “un-accommodating”
22 experience if they visit Disney’s theme parks in the future as a result of the DAS
23 system.

24 347. Disney lacks sufficient information or belief to admit or deny the
25 allegations in the first sentence of Paragraph 347 of the Complaint, and on that basis
26 denies them, except that Disney expressly denies the allegation and/or implication in
27 the second part of the first sentence of this paragraph that J.K. was “actually
28 accommodated” only with the GAC. Disney lacks sufficient information or belief to

1 admit or deny the allegations in the second and third sentences of Paragraph 347 of
2 the Complaint, and on that basis denies them. Disney denies the allegations in the
3 fourth sentence of this paragraph. The Prayer for Relief following Paragraph 347 of
4 the Complaint contains no factual assertions to which Disney is required to respond.
5 To the extent the Prayer for Relief may be deemed to require a response, Disney
6 denies each and every allegation in this paragraph (as well as the subparagraphs
7 therein), and denies that an injunction, remedial measures, attorneys' fees, litigation
8 costs, or any other relief sought is appropriate or required.

9 348. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
10 the Complaint as though fully set forth herein in response to Paragraph 348 of the
11 Complaint.

12 349. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 349 of the Complaint, and on that basis denies them.

14 350. The allegations of Paragraph 350 of the Complaint constitute
15 conclusions of law to which Disney is not required to respond. To the extent that
16 Disney is required to respond, it lacks sufficient information or belief to admit or
17 deny the allegations in Paragraph 350 of the Complaint, and on that basis denies
18 them.

19 351. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 351 of the Complaint, and on that basis denies them.

21 352. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 352 of the Complaint.

23 353. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 353 of the Complaint, and on that basis denies them.

25 354. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 354 of the Complaint, and on that basis denies them.

27 355. Disney admits that it has knowledge and experience in accommodating
28 guests with cognitive impairments but Disney lacks sufficient information or belief

1 to admit or deny the allegations in Paragraph 355 of the Complaint, and on that basis
2 denies them, except that Disney specifically denies the reference to what is “common
3 among autistic persons” and denies (with respect to the allegation regarding
4 repeating the ride over and over again without waiting) that the DAS system is in any
5 way deficient in providing the level of accommodation required by law.

6 356. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 356 of the Complaint, and on that basis denies them.

8 357. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 357 of the Complaint, and on that basis denies them.

10 358. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 358 of the Complaint, and on that basis denies them, but
12 Disney specifically denies the reference to what “most autistic persons” are capable
13 of.

14 359. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 359 of the Complaint, and on that basis denies them, except
16 that Disney expressly denies the allegation and/or implication in the second sentence
17 of this paragraph that it failed to accommodate D.M., and denies that the DAS
18 system is in any way deficient in providing the level of accommodation required by
19 law.

20 360. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 360 of the Complaint, and on that basis denies them.

22 361. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 361 of the Complaint, and on that basis denies them, except
24 that Disney specifically denies any implication that D.M. was “admirably
25 accommodated” only before the release of the DAS system.

26 362. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 362 of the Complaint, and on that basis denies them.

28 363. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 363 of the Complaint, and on that basis denies them.

2 364. Disney denies the allegations in Paragraph 364 of the Complaint, except
3 that it lacks sufficient information or belief to admit or deny the allegation that C.M.
4 did not renew her family's annual passes, and on that basis denies that allegation.

5 365. Disney lacks sufficient information or belief to admit or deny the
6 allegations in the first sentence of Paragraph 365 of the Complaint, and on that basis
7 denies them. Disney denies the allegations in the second sentence of Paragraph 365
8 of the Complaint except that Disney admits that it has knowledge and experience in
9 accommodating guests with cognitive impairments and that it has a long-standing,
10 unwavering commitment to providing a welcoming and inclusive environment and
11 accessible experience for guests with disabilities. Disney denies the remaining
12 allegations in this paragraph, except that because there is no identification of the
13 source of the purported statements quoted therein, there is no way to verify that they
14 are accurate, and on that basis Disney denies them.

15 366. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 366 of the Complaint, and on that basis denies them, except
17 that because there is no identification of the source of the purported statement that
18 "C.M. was not using Disney's accommodations as intended," there is no way to
19 verify its accuracy, and on that basis Disney denies this allegation.

20 367. Disney denies each and every allegation in Paragraph 367 of the
21 Complaint.

22 368. Disney denies the allegations in Paragraph 368 of the Complaint.

23 369. Disney lacks sufficient information or belief to admit or deny the
24 allegations in the first sentence and in the first part of the second sentence of
25 Paragraph 369 of the Complaint, and on that basis denies them. Disney denies the
26 allegations in the second part of the second sentence of this paragraph. The Prayer
27 for Relief following Paragraph 369 of the Complaint contains no factual assertions to
28 which Disney is required to respond. To the extent the Prayer for Relief may be

1 deemed to require a response, Disney denies each and every allegation in this
2 paragraph (as well as the subparagraphs therein), and denies that an injunction,
3 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
4 appropriate or required.

5 370. Disney reincorporates its answers to Paragraphs 1 through 66 and 349
6 through 369 of the Complaint as though fully set forth herein in response to
7 Paragraph 370 of the Complaint.

8 371. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 371 of the Complaint, and on that basis denies them.

10 372. The allegations of Paragraph 372 of the Complaint constitute
11 conclusions of law to which Disney is not required to respond. To the extent that
12 Disney is required to respond, it denies each and every allegation in this paragraph.

13 373. The allegations of Paragraph 373 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it denies each and every allegation in this paragraph.

16 374. The allegations of Paragraph 374 of the Complaint constitute
17 conclusions of law to which Disney is not required to respond. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph.
19 The Prayer for Relief following Paragraph 374 of the Complaint contains no factual
20 assertions to which Disney is required to respond. To the extent the Prayer for Relief
21 may be deemed to require a response, Disney denies each and every allegation in this
22 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
23 litigation costs, prejudgment interest or any other relief sought is appropriate or
24 required.

25 375. Disney reincorporates its answers to Paragraphs 1 through 66 and 349
26 through 369 of the Complaint as though fully set forth herein in response to
27 Paragraph 375 of the Complaint.

28 376. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 376 of the Complaint, and on that basis denies them.

2 377. The allegations of Paragraph 377 of the Complaint constitute
3 conclusions of law to which Disney is not required to respond. To the extent that
4 Disney is required to respond, it denies each and every allegation in this paragraph.

5 378. The allegations of Paragraph 378 of the Complaint constitute
6 conclusions of law to which Disney is not required to respond. To the extent that
7 Disney is required to respond, it denies each and every allegation in this paragraph.

8 379. The allegations of Paragraph 379 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph.
11 The Prayer for Relief following Paragraph 379 of the Complaint contains no factual
12 assertions to which Disney is required to respond. To the extent the Prayer for Relief
13 may be deemed to require a response, Disney denies each and every allegation in this
14 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
15 litigation costs, prejudgment interest or any other relief sought is appropriate or
16 required.

17 380. Disney reincorporates its answers to Paragraphs 1 through 66 and 349
18 through 369 of the Complaint as though fully set forth herein in response to
19 Paragraph 380 of the Complaint.

20 The allegations in the first misnumbered paragraph following Paragraph 380
21 of the Complaint constitute conclusions of law to which Disney is not required to
22 respond. To the extent that Disney is required to respond, it lacks sufficient
23 information or belief to admit or deny the allegations in the first misnumbered
24 paragraph following Paragraph 380 of the Complaint, and on that basis denies them.

25 Disney denies each and every allegation in the second misnumbered paragraph
26 following Paragraph 380 of the Complaint.

27 Disney denies the allegations in the third misnumbered paragraph following
28 Paragraph 380 of the Complaint. The Prayer for Relief in the unnumbered paragraph

1 following Paragraph 380 of the Complaint contains no factual assertions to which
2 Disney is required to respond. To the extent the Prayer for Relief may be deemed to
3 require a response, Disney denies each and every allegation in this paragraph (as
4 well as the subparagraphs therein), and denies that economic monetary damages,
5 litigation costs, prejudgment interest, or any other relief sought is appropriate or
6 required.

7 381. Disney reincorporates its answers to Paragraphs 1 through 66 and 349
8 through 369 of the Complaint as though fully set forth herein in response to
9 Paragraph 381 of the Complaint.

10 382. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 382 of the Complaint, and on that basis denies them.

12 383. The allegations of Paragraph 383 of the Complaint constitute
13 conclusions of law to which Disney is not required to respond. To the extent that
14 Disney is required to respond, it denies each and every allegation in this paragraph.

15 384. The allegations of Paragraph 384 of the Complaint constitute
16 conclusions of law to which Disney is not required to respond. To the extent that
17 Disney is required to respond, it denies each and every allegation in this paragraph.

18 385. Disney lacks sufficient information or belief to admit or deny the
19 allegations in the first sentence of Paragraph 385 of the Complaint, and on that basis
20 denies them. The remaining allegations of Paragraph 385 of the Complaint
21 constitute conclusions of law to which Disney is not required to respond. To the
22 extent that Disney is required to respond, it denies each and every allegation in this
23 paragraph.

24 386. The allegations of Paragraph 386 of the Complaint constitute
25 conclusions of law to which Disney is not required to respond. To the extent that
26 Disney is required to respond, it denies each and every allegation in this paragraph.
27 The Prayer for Relief following Paragraph 386 of the Complaint contains no factual
28 assertions to which Disney is required to respond. To the extent the Prayer for Relief

1 may be deemed to require a response, Disney denies each and every allegation in this
2 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
3 litigation costs, prejudgment interest or any other relief sought is appropriate or
4 required.

5 387. Disney reincorporates its answers to Paragraphs 1 through 66 and 349
6 through 369 of the Complaint as though fully set forth herein in response to
7 Paragraph 387 of the Complaint.

8 388. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 388 of the Complaint, and on that basis denies them.

10 389. The allegations of Paragraph 389 of the Complaint constitute
11 conclusions of law to which Disney is not required to respond. To the extent that
12 Disney is required to respond, it denies each and every allegation in this paragraph.

13 390. The allegations of Paragraph 390 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it denies each and every allegation in this paragraph.

16 391. Disney lacks sufficient information or belief to admit or deny the
17 allegations in the first sentence of Paragraph 391 of the Complaint, and on that basis
18 denies them. The remaining allegations of Paragraph 391 of the Complaint
19 constitute conclusions of law to which Disney is not required to respond. To the
20 extent that Disney is required to respond, it denies each and every allegation in this
21 paragraph.

22 392. The allegations of Paragraph 392 of the Complaint constitute
23 conclusions of law to which Disney is not required to respond. To the extent that
24 Disney is required to respond, it denies each and every allegation in this paragraph.
25 The Prayer for Relief following Paragraph 392 of the Complaint contains no factual
26 assertions to which Disney is required to respond. To the extent the Prayer for Relief
27 may be deemed to require a response, Disney denies each and every allegation in this
28 paragraph (as well as the subparagraphs therein), and denies that monetary damages,

1 litigation costs, prejudgment interest or any other relief sought is appropriate or
2 required.

3 393. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
4 the Complaint as though fully set forth herein in response to Paragraph 393 of the
5 Complaint.

6 394. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 394 of the Complaint, and on that basis denies them.

8 395. The allegations of Paragraph 395 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it lacks sufficient information or belief to admit or
11 deny the allegations in Paragraph 395 of the Complaint, and on that basis denies
12 them.

13 396. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 396 of the Complaint, and on that basis denies them.

15 397. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 397 of the Complaint.

17 398. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 398 of the Complaint, and on that basis denies them.

19 399. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 399 of the Complaint, and on that basis denies them.

21 400. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 400 of the Complaint, and on that basis denies them.

23 401. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 401 of the Complaint, and on that basis denies them.

25 402. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 402 of the Complaint, and on that basis denies them.

27 403. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 403 of the Complaint, and on that basis denies them, and

1 denies any implication that Disney’s policy regarding reviewing medical
2 documentation was changed by the DAS system.

3 404. Disney lacks sufficient information or belief to admit or deny the
4 allegations in the first and fourth sentences and in the first part of the third sentence
5 of Paragraph 404 of the Complaint, and on that basis denies them. Disney denies the
6 allegations in the second sentence of paragraph 404 of the Complaint as there is no
7 identification of the source of the purported statements described therein and
8 therefore no way to verify if they are accurate, and denies any implication that there
9 is widespread “disdain” for the DAS system. Disney also denies the allegations in
10 the second part of the third sentence and in the fifth sentence of this paragraph.

11 405. Disney denies each and every allegation in Paragraph 405 of the
12 Complaint.

13 406. Disney denies each and every allegation in Paragraph 406 of the
14 Complaint.

15 407. Disney denies each and every allegation in Paragraph 407 of the
16 Complaint.

17 408. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 408 of the Complaint, and on that basis denies them, but
19 Disney specifically denies the reference to what “other autistic children” are capable
20 of.

21 409. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 409 of the Complaint, and on that basis denies them.

23 410. Disney denies the allegations in the second part of the first sentence of
24 Paragraph 410 of the Complaint, but lacks sufficient information or belief to admit or
25 deny the remaining allegations in this paragraph, and on that basis denies them, and
26 Disney specifically denies that the DAS system is in any way deficient in providing
27 the level of accommodation required by law.

28 411. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 411 of the Complaint, and on that basis denies them.

2 412. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 412 of the Complaint, and on that basis denies them, except
4 that Disney specifically denies (with respect to the allegation regarding going to a
5 ride and riding it without waiting) that the DAS system is in any way deficient in
6 providing the level of accommodation required by law.

7 413. Disney denies the allegations in the first sentence of Paragraph 413 of
8 the Complaint. Disney lacks sufficient information or belief to admit or deny the
9 remaining allegations in this paragraph, and on that basis denies them, but Disney
10 specifically denies the reference to what “most autistic persons” are capable of.

11 414. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 414 of the Complaint, and on that basis denies them.

13 415. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 415 of the Complaint, and on that basis denies them.

15 416. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 416 of the Complaint, and on that basis denies them.

17 417. Disney denies the allegations in the second part of Paragraph 417 of the
18 Complaint, but lacks sufficient information or belief to admit or deny the remaining
19 allegations in this paragraph, and on that basis denies them.

20 418. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 418 of the Complaint, and on that basis denies them.

22 419. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 419 of the Complaint, and on that basis denies them, except
24 that Disney denies any implication that the abuse of the GAC system only started in
25 2013.

26 420. Disney denies allegations in Paragraph 420 of the Complaint.

27 421. Disney denies the allegations in the first sentence of Paragraph 421 of
28 the Complaint. Disney lacks sufficient information or belief to admit or deny the

1 allegations in the second sentence and in the first part of the third sentence of
2 Paragraph 421 of the Complaint, and on that basis denies them. Disney denies the
3 allegations in the second part of the third sentence of this paragraph.

4 422. Disney denies the allegations in Paragraph 422 of the Complaint. The
5 Prayer for Relief following Paragraph 422 of the Complaint contains no factual
6 assertions to which Disney is required to respond. To the extent the Prayer for Relief
7 may be deemed to require a response, Disney denies each and every allegation in this
8 paragraph (as well as the subparagraphs therein), and denies that an injunction,
9 remedial measures, attorneys' fees, litigation costs, or any other relief sought is
10 appropriate or required.

11 423. Disney reincorporates its answers to Paragraphs 1 through 66 and 394
12 through 422 of the Complaint as though fully set forth herein in response to
13 Paragraph 423 of the Complaint.

14 424. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 424 of the Complaint, and on that basis denies them.

16 425. The allegations of Paragraph 425 of the Complaint constitute
17 conclusions of law to which Disney is not required to respond. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph.

19 426. The allegations of Paragraph 426 of the Complaint constitute
20 conclusions of law to which Disney is not required to respond. To the extent that
21 Disney is required to respond, it denies each and every allegation in this paragraph.

22 427. The allegations of Paragraph 427 of the Complaint constitute
23 conclusions of law to which Disney is not required to respond. To the extent that
24 Disney is required to respond, it denies each and every allegation in this paragraph.
25 The Prayer for Relief following Paragraph 427 of the Complaint contains no factual
26 assertions to which Disney is required to respond. To the extent the Prayer for Relief
27 may be deemed to require a response, Disney denies each and every allegation in this
28 paragraph (as well as the subparagraphs therein), and denies that monetary damages,

1 litigation costs, prejudgment interest or any other relief sought is appropriate or
2 required.

3 428. Disney reincorporates its answers to Paragraphs 1 through 66 and 394
4 through 422 of the Complaint as though fully set forth herein in response to
5 Paragraph 428 of the Complaint.

6 429. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 429 of the Complaint, and on that basis denies them.

8 430. The allegations of Paragraph 430 of the Complaint constitute
9 conclusions of law to which Disney is not required to respond. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph.

11 431. The allegations of Paragraph 431 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.

14 432. The allegations of Paragraph 432 of the Complaint constitute
15 conclusions of law to which Disney is not required to respond. To the extent that
16 Disney is required to respond, it denies each and every allegation in this paragraph.
17 The Prayer for Relief following Paragraph 432 of the Complaint contains no factual
18 assertions to which Disney is required to respond. To the extent the Prayer for Relief
19 may be deemed to require a response, Disney denies the allegations in this paragraph
20 (as well as the subparagraphs therein), and denies that monetary damages, litigation
21 costs, prejudgment interest or any other relief sought is appropriate or required.

22 433. Disney reincorporates its answers to Paragraphs 1 through 66 and 394
23 through 422 of the Complaint as though fully set forth herein in response to
24 Paragraph 433 of the Complaint.

25 434. The allegations of Paragraph 434 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it lacks sufficient information or belief to admit or
28 deny the allegations in Paragraph 434 of the Complaint, and on that basis denies

1 them.

2 435. Disney denies each and every allegation in Paragraph 435 of the
3 Complaint.

4 436. Disney denies the allegations in Paragraph 436 of the Complaint. The
5 Prayer for Relief following Paragraph 436 of the Complaint contains no factual
6 assertions to which Disney is required to respond. To the extent the Prayer for Relief
7 may be deemed to require a response, Disney denies each and every allegation in this
8 paragraph (as well as the subparagraphs therein), and denies that economic monetary
9 damages, litigation costs, prejudgment interest, or any other relief sought is
10 appropriate or required.

11 437. Disney reincorporates its answers to Paragraphs 1 through 66 and 394
12 through 422 of the Complaint as though fully set forth herein in response to
13 Paragraph 437 of the Complaint.

14 438. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 438 of the Complaint, and on that basis denies them.

16 439. The allegations of Paragraph 439 of the Complaint constitute
17 conclusions of law to which Disney is not required to respond. To the extent that
18 Disney is required to respond, it denies each and every allegation in this paragraph.

19 440. The allegations of Paragraph 440 of the Complaint constitute
20 conclusions of law to which Disney is not required to respond. To the extent that
21 Disney is required to respond, it denies each and every allegation in this paragraph.

22 441. Disney lacks sufficient information or belief to admit or deny the
23 allegations in the first sentence of Paragraph 441 of the Complaint, and on that basis
24 denies them. The remaining allegations of Paragraph 441 of the Complaint
25 constitute conclusions of law to which Disney is not required to respond. To the
26 extent that Disney is required to respond, it denies each and every allegation in this
27 paragraph.

28 442. The allegations of Paragraph 442 of the Complaint constitute

1 conclusions of law to which Disney is not required to respond. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph.
3 The Prayer for Relief following Paragraph 442 of the Complaint contains no factual
4 assertions to which Disney is required to respond. To the extent the Prayer for Relief
5 may be deemed to require a response, Disney denies each and every allegation in this
6 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
7 litigation costs, prejudgment interest or any other relief sought is appropriate or
8 required.

9 443. Disney reincorporates its answers to Paragraphs 1 through 66 and 394
10 through 422 of the Complaint as though fully set forth herein in response to
11 Paragraph 443 of the Complaint.

12 444. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 444 of the Complaint, and on that basis denies them.

14 445. The allegations of Paragraph 445 of the Complaint constitute
15 conclusions of law to which Disney is not required to respond. To the extent that
16 Disney is required to respond, it denies each and every allegation in this paragraph.

17 446. The allegations of Paragraph 446 of the Complaint constitute
18 conclusions of law to which Disney is not required to respond. To the extent that
19 Disney is required to respond, it denies each and every allegation in this paragraph.

20 447. Disney lacks sufficient information or belief to admit or deny the
21 allegations in the first sentence of Paragraph 447 of the Complaint, and on that basis
22 denies them. The remaining allegations of Paragraph 447 of the Complaint
23 constitute conclusions of law to which Disney is not required to respond. To the
24 extent that Disney is required to respond, it denies each and every allegation in this
25 paragraph.

26 448. The allegations of Paragraph 448 of the Complaint constitute
27 conclusions of law to which Disney is not required to respond. To the extent that
28 Disney is required to respond, it denies each and every allegation in this paragraph.

1 The Prayer for Relief following Paragraph 448 of the Complaint contains no factual
2 assertions to which Disney is required to respond. To the extent the Prayer for Relief
3 may be deemed to require a response, Disney denies each and every allegation in this
4 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
5 litigation costs, prejudgment interest or any other relief sought is appropriate or
6 required.

7 449. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
8 the Complaint as though fully set forth herein in response to Paragraph 449 of the
9 Complaint.

10 450. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 450 of the Complaint, and on that basis denies them.

12 451. The allegations of Paragraph 451 of the Complaint constitute
13 conclusions of law to which Disney is not required to respond. To the extent that
14 Disney is required to respond, it lacks sufficient information or belief to admit or
15 deny the allegations in Paragraph 451 of the Complaint, and on that basis denies
16 them.

17 452. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 452 of the Complaint, and on that basis denies them.

19 453. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 453 of the Complaint.

21 454. Disney lacks sufficient information or belief to admit or deny the
22 allegations in Paragraph 454 of the Complaint, and on that basis denies them.

23 455. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 455 of the Complaint, and on that basis denies them, except
25 that Disney specifically denies any implication that T.P. was “admirably
26 accommodated” only before October 9, 2013.

27 456. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 456 of the Complaint, and on that basis denies them.

1 457. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 457 of the Complaint, and on that basis denies them, except
3 that Disney specifically denies (with respect to the allegation regarding riding a ride
4 at a particular time and in a particular order without waiting) that the DAS system is
5 in any way deficient in providing the level of accommodation required by law.

6 458. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 458 of the Complaint, and on that basis denies them.

8 459. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 459 of the Complaint, but Disney specifically denies the
10 allegation that “the new DAS creates avoidable stressors for T.P.”

11 460. Disney denies each and every allegation in Paragraph 460 of the
12 Complaint.

13 461. Disney lacks sufficient information or belief to admit or deny the
14 allegations in the first sentence of Paragraph 461 of the Complaint, and on that basis
15 denies them, except that because there is no identification of the email which
16 purportedly explained the “hardship” the DAS system caused S.P. and T.P., there is
17 no way to verify its accuracy, and on that basis Disney denies this allegation. Disney
18 denies the allegations in the second sentence of Paragraph 461 of the Complaint.
19 Disney lacks sufficient information or belief to admit or deny the allegations in the
20 third and fourth sentences of Paragraph 461 of the Complaint, and on that basis
21 denies them, except that Disney expressly denies the allegation and/or implication
22 that it failed to accommodate T.P.

23 462. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 462 of the Complaint, and on that basis denies them, except
25 that Disney specifically denies the statement that T.P. and S.P. no longer received
26 “the type of attention” after the DAS system was implemented.

27 463. Disney denies the allegations in the first and second sentences of
28 Paragraph 463 of the Complaint. Disney lacks sufficient information or belief to

1 admit or deny the allegations in the third sentence of Paragraph 463 of the
2 Complaint, and on that basis denies them. Disney denies the allegations in the fourth
3 sentence of this paragraph, including that S.P. and T.P. had an “un-accommodating”
4 experience during their prior visits to Disney’s theme parks as a result of the DAS
5 system.

6 464. Disney denies the allegations in Paragraph 464 of the Complaint except
7 that Disney admits that it has knowledge and experience in accommodating guests
8 with cognitive impairments and that it has a long-standing, unwavering commitment
9 to providing a welcoming and inclusive environment and accessible experience for
10 guests with disabilities.

11 465. Disney denies each and every allegation in Paragraph 465 of the
12 Complaint.

13 466. Disney denies the allegations in Paragraph 466 of the Complaint.

14 467. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 467 of the Complaint, and on that basis denies them. The
16 Prayer for Relief following Paragraph 467 of the Complaint contains no factual
17 assertions to which Disney is required to respond. To the extent the Prayer for Relief
18 may be deemed to require a response, Disney denies each and every allegation in this
19 paragraph (as well as the subparagraphs therein), and denies that an injunction,
20 remedial measures, attorneys’ fees, litigation costs, or any other relief sought is
21 appropriate or required.

22 468. Disney reincorporates its answers to Paragraphs 1 through 68 and 450
23 through 467 of the Complaint as though fully set forth herein in response to
24 Paragraph 468 of the Complaint.

25 469. The allegations of Paragraph 469 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it denies each and every allegation in this paragraph.

28 470. Paragraph 470 of the Complaint is Plaintiff’s characterization of the law

1 and contains no factual assertions to which a response is required. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph as
3 it relates to Disney.

4 471. Paragraph 471 of the Complaint is Plaintiff's characterization of the law
5 and contains no factual assertions to which a response is required. To the extent that
6 Disney is required to respond, it denies each and every allegation in this paragraph as
7 it relates to Disney.

8 472. Paragraph 472 of the Complaint is Plaintiff's characterization of the law
9 and contains no factual assertions to which a response is required. To the extent that
10 Disney is required to respond, it denies each and every allegation in this paragraph as
11 it relates to Disney.

12 473. The allegations of Paragraph 473 of the Complaint constitute
13 conclusions of law to which Disney is not required to respond.

14 474. Disney denies each and every allegation in Paragraph 474 of the
15 Complaint.

16 475. Disney denies each and every allegation in Paragraph 475 of the
17 Complaint. The Prayer for Relief following Paragraph 475 of the Complaint
18 contains no factual assertions to which Disney is required to respond. To the extent
19 the Prayer for Relief may be deemed to require a response, Disney denies each and
20 every allegation in this paragraph (as well as the subparagraphs therein), and denies
21 that an injunction, remedial measures, attorneys' fees, litigation costs, or any other
22 relief sought is appropriate or required.

23 476. Disney reincorporates its answers to Paragraphs 1 through 66 and 450
24 through 467 of the Complaint as though fully set forth herein in response to
25 Paragraph 476 of the Complaint.

26 477. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 477 of the Complaint, and on that basis denies them.

28 478. The allegations of Paragraph 478 of the Complaint constitute

1 conclusions of law to which Disney is not required to respond. To the extent that
2 Disney is required to respond, it denies each and every allegation in this paragraph.

3 479. The allegations of Paragraph 479 of the Complaint constitute
4 conclusions of law to which Disney is not required to respond. To the extent that
5 Disney is required to respond, it denies each and every allegation in this paragraph.

6 480. The allegations of Paragraph 480 of the Complaint constitute
7 conclusions of law to which Disney is not required to respond. To the extent that
8 Disney is required to respond, it denies each and every allegation in this paragraph.
9 The Prayer for Relief following Paragraph 480 of the Complaint contains no factual
10 assertions to which Disney is required to respond. To the extent the Prayer for Relief
11 may be deemed to require a response, Disney denies each and every allegation in this
12 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
13 litigation costs, prejudgment interest or any other relief sought is appropriate or
14 required.

15 481. Disney reincorporates its answers to Paragraphs 1 through 67 and 450
16 through 467 of the Complaint as though fully set forth herein in response to
17 Paragraph 481 of the Complaint.

18 482. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 482 of the Complaint, and on that basis denies them.

20 483. The allegations of Paragraph 483 of the Complaint constitute
21 conclusions of law to which Disney is not required to respond. To the extent that
22 Disney is required to respond, it denies each and every allegation in this paragraph.

23 484. The allegations of Paragraph 484 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it denies each and every allegation in this paragraph.

26 485. The allegations of Paragraph 485 of the Complaint constitute
27 conclusions of law to which Disney is not required to respond. To the extent that
28 Disney is required to respond, it denies each and every allegation in this paragraph.

1 The Prayer for Relief following Paragraph 485 of the Complaint contains no factual
2 assertions to which Disney is required to respond. To the extent the Prayer for Relief
3 may be deemed to require a response, Disney denies each and every allegation in this
4 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
5 litigation costs, prejudgment interest or any other relief sought is appropriate or
6 required.

7 486. Disney reincorporates its answers to Paragraphs 1 through 66 and 450
8 through 467 of the Complaint as though fully set forth herein in response to
9 Paragraph 486 of the Complaint.

10 487. The allegations of Paragraph 487 of the Complaint constitute
11 conclusions of law to which Disney is not required to respond. To the extent that
12 Disney is required to respond, it lacks sufficient information or belief to admit or
13 deny the allegations in Paragraph 487 of the Complaint, and on that basis denies
14 them.

15 488. Disney denies each and every allegation in Paragraph 488 of the
16 Complaint.

17 489. Disney denies the allegations in Paragraph 489 of the Complaint. The
18 Prayer for Relief following Paragraph 489 of the Complaint contains no factual
19 assertions to which Disney is required to respond. To the extent the Prayer for Relief
20 may be deemed to require a response, Disney denies each and every allegation in this
21 paragraph (as well as the subparagraphs therein), and denies that economic monetary
22 damages, litigation costs, prejudgment interest, or any other relief sought is
23 appropriate or required.

24 490. Disney reincorporates its answers to Paragraphs 1 through 66 and 450
25 through 467 of the Complaint as though fully set forth herein in response to
26 Paragraph 490 of the Complaint.

27 491. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 491 of the Complaint, and on that basis denies them.

1 492. The allegations of Paragraph 492 of the Complaint constitute
2 conclusions of law to which Disney is not required to respond. To the extent that
3 Disney is required to respond, it denies each and every allegation in this paragraph.

4 493. The allegations of Paragraph 493 of the Complaint constitute
5 conclusions of law to which Disney is not required to respond. To the extent that
6 Disney is required to respond, it denies each and every allegation in this paragraph.

7 494. Disney lacks sufficient information or belief to admit or deny the
8 allegations in the first sentence of Paragraph 494 of the Complaint, and on that basis
9 denies them. The remaining allegations of Paragraph 494 of the Complaint
10 constitute conclusions of law to which Disney is not required to respond. To the
11 extent that Disney is required to respond, it denies each and every allegation in this
12 paragraph.

13 495. The allegations of Paragraph 495 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it denies each and every allegation in this paragraph.
16 The Prayer for Relief following Paragraph 495 of the Complaint contains no factual
17 assertions to which Disney is required to respond. To the extent the Prayer for Relief
18 may be deemed to require a response, Disney denies each and every allegation in this
19 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
20 litigation costs, prejudgment interest or any other relief sought is appropriate or
21 required.

22 496. Disney reincorporates its answers to Paragraphs 1 through 67 and 450
23 through 467 of the Complaint as though fully set forth herein in response to
24 Paragraph 496 of the Complaint.

25 497. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 497 of the Complaint, and on that basis denies them.

27 498. The allegations of Paragraph 498 of the Complaint constitute
28 conclusions of law to which Disney is not required to respond. To the extent that

1 Disney is required to respond, it denies each and every allegation in this paragraph.

2 499. The allegations of Paragraph 499 of the Complaint constitute
3 conclusions of law to which Disney is not required to respond. To the extent that
4 Disney is required to respond, it denies each and every allegation in this paragraph.

5 500. Disney lacks sufficient information or belief to admit or deny the
6 allegations in the first sentence of Paragraph 500 of the Complaint, and on that basis
7 denies them. The remaining allegations of Paragraph 500 of the Complaint
8 constitute conclusions of law to which Disney is not required to respond. To the
9 extent that Disney is required to respond, it denies each and every allegation in this
10 paragraph.

11 501. The allegations of Paragraph 501 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.
14 The Prayer for Relief following Paragraph 501 of the Complaint contains no factual
15 assertions to which Disney is required to respond. To the extent the Prayer for Relief
16 may be deemed to require a response, Disney denies each and every allegation in this
17 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
18 litigation costs, prejudgment interest or any other relief sought is appropriate or
19 required.

20 502. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
21 the Complaint as though fully set forth herein in response to Paragraph 502 of the
22 Complaint.

23 503. Disney lacks sufficient information or belief to admit or deny the
24 allegations in Paragraph 503 of the Complaint, and on that basis denies them.

25 504. The allegations of Paragraph 504 of the Complaint constitute
26 conclusions of law to which Disney is not required to respond. To the extent that
27 Disney is required to respond, it lacks sufficient information or belief to admit or
28 deny the allegations in Paragraph 504 of the Complaint, and on that basis denies

1 them.

2 505. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 505 of the Complaint, and on that basis denies them.

4 506. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 506 of the Complaint.

6 507. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 507 of the Complaint, and on that basis denies them.

8 508. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 508 of the Complaint, and on that basis denies them, except
10 that Disney specifically denies any implication that D.L.J. was “admirably
11 accommodated” only before October 9, 2013.

12 509. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 509 of the Complaint, and on that basis denies them.

14 510. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 510 of the Complaint, and on that basis denies them.

16 511. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 511 of the Complaint, and on that basis denies them, except
18 that Disney specifically denies any implication that guests with disabilities, including
19 guests with cognitive disabilities, were “admirably accommodated” only before
20 October 9, 2013.

21 512. Disney denies the allegations in Paragraph 512 of the Complaint.

22 513. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 513 of the Complaint, and on that basis denies them, except
24 that Disney expressly denies the allegation and/or implication that D.L.J. and her
25 children will have an un-accommodating experience if they visit Disney’s theme
26 parks in September 2014 as a result of the DAS system.

27 514. Disney denies the allegations in the first sentence of Paragraph 514 of
28 the Complaint. Disney lacks sufficient information or belief to admit or deny the

1 allegations in the second sentence of Paragraph 514 of the Complaint, and on that
2 basis denies them, except that Disney admits it has informed guests that it will work
3 individually with guests with disabilities to provide assistance that is responsive to
4 their circumstances.

5 515. Disney denies the allegations in Paragraph 515 of the Complaint.

6 516. Disney lacks sufficient information or belief to admit or deny the
7 allegations in the first sentence and in the first part of the second sentence of
8 Paragraph 516 of the Complaint, and on that basis denies them, except that Disney
9 admits it works individually with guests with disabilities to provide assistance that is
10 responsive to their circumstances. Disney denies the allegations in the second part of
11 the second sentence of this paragraph.

12 517. Disney lacks sufficient information or belief to admit or deny the
13 allegations in the first sentence of Paragraph 517 of the Complaint, and on that basis
14 denies them. Disney denies the allegations in the second sentence of this paragraph.
15 Disney lacks sufficient information or belief to admit or deny the allegations in the
16 third sentence of Paragraph 517 of the Complaint, and on that basis denies them.

17 518. Disney lacks sufficient information or belief to admit or deny the
18 allegations in Paragraph 518 of the Complaint, and on that basis denies them.

19 519. Disney lacks sufficient information or belief to admit or deny the
20 allegations in Paragraph 519 of the Complaint, and on that basis denies them, except
21 that Disney expressly denies any implication (with respect to the allegation regarding
22 visiting attractions and rides in a specific, pre-defined order without waiting) that the
23 DAS system is in any way unreasonable or deficient in providing the level of
24 accommodation required by law.

25 520. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 520 of the Complaint, and on that basis denies them.

27 521. Disney denies the allegations in the first sentence of Paragraph 521 of
28 the Complaint. Disney lacks sufficient information or belief to admit or deny the

1 allegations in the second sentence of Paragraph 521 of the Complaint. Disney denies
2 the remaining allegations of this paragraph. The Prayer for Relief following
3 Paragraph 521 of the Complaint contains no factual assertions to which Disney is
4 required to respond. To the extent the Prayer for Relief may be deemed to require a
5 response, Disney denies each and every allegation in this paragraph (as well as the
6 subparagraphs therein), and denies that an injunction, remedial measures, attorneys'
7 fees, litigation costs, or any other relief sought is appropriate or required.

8 522. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
9 the Complaint as though fully set forth herein in response to Paragraph 522 of the
10 Complaint.

11 523. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 523 of the Complaint, and on that basis denies them.

13 524. The allegations of Paragraph 524 of the Complaint constitute
14 conclusions of law to which Disney is not required to respond. To the extent that
15 Disney is required to respond, it lacks sufficient information or belief to admit or
16 deny the allegations in Paragraph 524 of the Complaint, and on that basis denies
17 them.

18 525. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 525 of the Complaint, and on that basis denies them.

20 526. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 526 of the Complaint.

22 527. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 527 of the Complaint, and on that basis denies them.

24 528. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 528 of the Complaint, and on that basis denies them, except
26 that Disney specifically denies any implication that D.L.J. was “admirably
27 accommodated” only before October 9, 2013.

28 529. Disney lacks sufficient information or belief to admit or deny the

1 allegations in Paragraph 529 of the Complaint, and on that basis denies them.

2 530. Disney lacks sufficient information or belief to admit or deny the
3 allegations in Paragraph 530 of the Complaint, and on that basis denies them.

4 531. Disney lacks sufficient information or belief to admit or deny the
5 allegations in Paragraph 531 of the Complaint, and on that basis denies them, except
6 that Disney specifically denies any implication that guests with disabilities, including
7 guests with cognitive disabilities, were “admirably accommodated” only before
8 October 9, 2013.

9 532. Disney denies the allegations in Paragraph 532 of the Complaint.

10 533. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 533 of the Complaint, and on that basis denies them, except
12 that Disney expressly denies the allegation and/or implication that D.L.J. and her
13 children will have an un-accommodating experience if they visit Disney’s theme
14 parks in September 2014 as a result of the DAS system.

15 534. Disney denies the allegations in the first sentence of Paragraph 534 of
16 the Complaint. Disney lacks sufficient information or belief to admit or deny the
17 allegations in the first part of the second sentence of Paragraph 534 of the Complaint,
18 and on that basis denies them, except that Disney admits it has informed guests that
19 it will work individually with guests with disabilities to provide assistance that is
20 responsive to their circumstances. Disney denies the allegations in the second part of
21 the second sentence of this paragraph.

22 535. Disney denies the allegations in Paragraph 535 of the Complaint.

23 536. Disney lacks sufficient information or belief to admit or deny the
24 allegations in the first sentence and in the first part of the second sentence of
25 Paragraph 536 of the Complaint, and on that basis denies them, except that Disney
26 admits it works individually with guests with disabilities to provide assistance that is
27 responsive to their circumstances. Disney denies the allegations in the second part of
28 the second sentence of this paragraph.

1 537. Disney lacks sufficient information or belief to admit or deny the
2 allegations in the first sentence of Paragraph 537 of the Complaint, and on that basis
3 denies them. Disney denies the allegations in the second sentence of this paragraph.
4 Disney lacks sufficient information or belief to admit or deny the allegations in the
5 third sentence of Paragraph 537 of the Complaint, and on that basis denies them.

6 538. Disney lacks sufficient information or belief to admit or deny the
7 allegations in Paragraph 538 of the Complaint, and on that basis denies them.

8 539. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 539 of the Complaint, and on that basis denies them, except
10 that Disney specifically denies (with respect to the allegation regarding visiting rides
11 in a specific order without waiting) that the DAS system is in any way deficient in
12 providing the level of accommodation required by law.

13 540. Disney lacks sufficient information or belief to admit or deny the
14 allegations in Paragraph 540 of the Complaint, and on that basis denies them.

15 541. Disney lacks sufficient information or belief to admit or deny the
16 allegations in Paragraph 541 of the Complaint, and on that basis denies them.

17 542. Disney denies the allegations in the first sentence of Paragraph 542 of
18 the Complaint. Disney lacks sufficient information or belief to admit or deny the
19 allegations in the second sentence of Paragraph 542 of the Complaint. Disney denies
20 the remaining allegations of this paragraph. The Prayer for Relief following
21 Paragraph 542 of the Complaint contains no factual assertions to which Disney is
22 required to respond. To the extent the Prayer for Relief may be deemed to require a
23 response, Disney denies each and every allegation in this paragraph (as well as the
24 subparagraphs therein), and denies that an injunction, remedial measures, attorneys'
25 fees, litigation costs, or any other relief sought is appropriate or required.

26 543. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
27 the Complaint as though fully set forth herein in response to Paragraph 543 of the
28 Complaint.

1 544. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 544 of the Complaint, and on that basis denies them.

3 545. The allegations of Paragraph 545 of the Complaint constitute
4 conclusions of law to which Disney is not required to respond. To the extent that
5 Disney is required to respond, it lacks sufficient information or belief to admit or
6 deny the allegations in Paragraph 545 of the Complaint, and on that basis denies
7 them.

8 546. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 546 of the Complaint, and on that basis denies them.

10 547. Disney lacks sufficient information or belief to admit or deny the
11 allegations in Paragraph 547 of the Complaint.

12 548. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 548 of the Complaint, and on that basis denies them.

14 549. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 549 of the Complaint, and on that basis denies them.

16 550. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 550 of the Complaint, and on that basis denies them, except
18 that Disney specifically denies any implication that S.G. was “admirably
19 accommodated” only before October 9, 2013.

20 551. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 551 of the Complaint, and on that basis denies them.

22 552. The allegations of Paragraph 552 of the Complaint constitute
23 conclusions of law to which Disney is not required to respond. To the extent Disney
24 is required to respond, it denies the allegations in this paragraph.

25 553. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 553 of the Complaint, and on that basis denies them.

27 554. Disney lacks sufficient information or belief to admit or deny the
28 allegations in Paragraph 554 of the Complaint, and on that basis denies them.

1 555. Disney denies the allegations in the first and third sentences of
2 Paragraph 555 of the Complaint. Disney lacks sufficient information or belief to
3 admit or deny the allegations in the second sentence of Paragraph 555 of the
4 Complaint, and on that basis denies them.

5 556. Disney admits that it has knowledge and experience in accommodating
6 guests with cognitive impairments but Disney lacks sufficient information or belief
7 to admit or deny the allegations in Paragraph 556 of the Complaint, and on that basis
8 denies them, except that Disney specifically denies the reference to what is “common
9 among autistic persons,” and also denies (with respect to the allegation regarding
10 repeating the ride over and over again without waiting) that the DAS system is in any
11 way deficient in providing the level of accommodation required by law.

12 557. Disney denies each and every allegation in Paragraph 557 of the
13 Complaint.

14 558. Disney lacks sufficient information or belief to admit or deny the
15 allegations in the first sentence of Paragraph 558 of the Complaint, and on that basis
16 denies them, except that because there is no identification of the specific date and
17 recipient of the purported voice messages which allegedly explained the “hardship”
18 that the DAS system would cause to S.G., there is no way to verify its accuracy, and
19 on that basis Disney denies this allegation, and Disney also expressly denies the
20 allegation and/or implication in this paragraph that it would not accommodate S.G.
21 and others like her.

22 559. Disney denies each and every allegation in Paragraph 559 of the
23 Complaint.

24 560. Disney denies the allegations in Paragraph 560 of the Complaint,
25 including any implication that the DAS system deters guests with disabilities from
26 visiting Disney’s theme parks, but lacks sufficient information or belief to admit or
27 deny the allegations that “the Sunshine Foundation makes S.G. eligible for a trip to
28 Disney.”

1 561. Disney denies the allegations in Paragraph 561 of the Complaint except
2 that Disney admits that it has knowledge and experience in accommodating guests
3 with cognitive impairments and that it has a long-standing, unwavering commitment
4 to providing a welcoming and inclusive environment and accessible experience for
5 guests with disabilities.

6 562. Disney denies each and every allegation in Paragraph 562 of the
7 Complaint.

8 563. Disney lacks sufficient information or belief to admit or deny the
9 allegations in the first and second sentences of Paragraph 563 of the Complaint.
10 Disney denies the allegations in the third and fourth sentences of Paragraph 563 of
11 the Complaint, and specifically denies that S.G. and S.M.G. had an “un-
12 accommodating” experience during prior visits to Disney’s theme parks as a result of
13 the DAS system. The Prayer for Relief following Paragraph 563 of the Complaint
14 contains no factual assertions to which Disney is required to respond. To the extent
15 the Prayer for Relief may be deemed to require a response, Disney denies each and
16 every allegation in this paragraph (as well as the subparagraphs therein), and denies
17 that an injunction, remedial measures, attorneys’ fees, litigation costs, or any other
18 relief sought is appropriate or required.

19 564. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
20 the Complaint as though fully set forth herein in response to Paragraph 564 of the
21 Complaint.

22 565. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 565 of the Complaint, and on that basis denies them.

24 566. The allegations of Paragraph 566 of the Complaint constitute
25 conclusions of law to which Disney is not required to respond. To the extent that
26 Disney is required to respond, it lacks sufficient information or belief to admit or
27 deny the allegations in Paragraph 566 of the Complaint, and on that basis denies
28 them.

1 567. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 567 of the Complaint, and on that basis denies them.

3 568. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 568 of the Complaint.

5 569. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 569 of the Complaint, and on that basis denies them.

7 570. Disney lacks sufficient information or belief to admit or deny the
8 allegations in Paragraph 570 of the Complaint, and on that basis denies them.

9 571. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 571 of the Complaint, and on that basis denies them.

11 572. Disney lacks sufficient information or belief to admit or deny the
12 allegations in Paragraph 572 of the Complaint, and on that basis denies them.

13 573. Disney denies each and every allegation in Paragraph 573 of the
14 Complaint.

15 574. Disney denies each and every allegation in Paragraph 574 of the
16 Complaint.

17 575. Disney denies the allegations in Paragraph 575 of the Complaint, except
18 Disney admits that the DAS card offers guests a return time for rides and attractions
19 based on the approximate current wait time minus ten minutes.

20 576. Disney denies the allegations in Paragraph 576 of the Complaint, except
21 that it admits that its annual passes are valid for 12 months and that the DAS card
22 was initially valid for up to 14 days and that Disney subsequently made them
23 available for up to 60 days with the particular time period being based upon whether
24 the guest had a day ticket or annual pass.

25 577. Disney lacks sufficient information or belief to admit or deny the
26 allegations in Paragraph 577 of the Complaint, and on that basis denies them, except
27 that Disney admits that MagicBands can be used to access rides in connection with
28 Disney's FASTPASS service and re-admission passes.

1 578. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 578 of the Complaint, and on that basis denies them.

3 579. Disney lacks sufficient information or belief to admit or deny the
4 allegations in Paragraph 579 of the Complaint, and on that basis denies them.

5 580. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 580 of the Complaint, and on that basis denies them, except
7 that Disney specifically denies the allegations in this paragraph that purport to
8 contrast the GAC system with the DAS system.

9 581. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 581 of the Complaint, and on that basis denies them, but
11 Disney specifically denies the implication that J.B. and K.B. were provided a “one-
12 time only accommodation.”

13 582. Disney denies each and every allegation in Paragraph 582 of the
14 Complaint.

15 583. Disney denies the allegations in Paragraph 583 of the Complaint except
16 that Disney admits that it has knowledge and experience in accommodating guests
17 with cognitive impairments and that it has a long-standing, unwavering commitment
18 to providing a welcoming and inclusive environment and accessible experience for
19 guests with disabilities.

20 584. Disney denies each and every allegation in Paragraph 584 of the
21 Complaint.

22 585. Disney denies the allegations in Paragraph 585 of the Complaint.

23 586. Disney lacks sufficient information or belief to admit or deny the
24 allegations in the first and second sentences of Paragraph 586 of the Complaint.
25 Disney denies the allegations in the third and fourth sentences of Paragraph 586 of
26 the Complaint, and specifically denies that S.G. and S.M.G. had an “un-
27 accommodating” experience during prior visits to Disney’s theme parks as a result of
28 the DAS system. The Prayer for Relief following Paragraph 586 of the Complaint

1 contains no factual assertions to which Disney is required to respond. To the extent
2 the Prayer for Relief may be deemed to require a response, Disney denies each and
3 every allegation in this paragraph (as well as the subparagraphs therein), and denies
4 that an injunction, remedial measures, attorneys' fees, litigation costs, or any other
5 relief sought is appropriate or required.

6 587. Disney reincorporates its answers to Paragraphs 1 through 66 and 565
7 through 586 of the Complaint as though fully set forth herein in response to
8 Paragraph 587 of the Complaint.

9 588. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 588 of the Complaint, and on that basis denies them.

11 589. The allegations of Paragraph 589 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.

14 590. The allegations of Paragraph 590 of the Complaint constitute
15 conclusions of law to which Disney is not required to respond. To the extent that
16 Disney is required to respond, it denies each and every allegation in this paragraph.

17 591. The allegations of Paragraph 591 of the Complaint constitute
18 conclusions of law to which Disney is not required to respond. To the extent that
19 Disney is required to respond, it denies each and every allegation in this paragraph.
20 The Prayer for Relief following Paragraph 591 of the Complaint contains no factual
21 assertions to which Disney is required to respond. To the extent the Prayer for Relief
22 may be deemed to require a response, Disney denies each and every allegation in this
23 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
24 litigation costs, prejudgment interest or any other relief sought is appropriate or
25 required.

26 592. Disney reincorporates its answers to Paragraphs 1 through 66 and 565
27 through 586 of the Complaint as though fully set forth herein in response to
28 Paragraph 592 of the Complaint.

1 593. Disney lacks sufficient information or belief to admit or deny the
2 allegations in Paragraph 593 of the Complaint, and on that basis denies them.

3 594. The allegations of Paragraph 594 of the Complaint constitute
4 conclusions of law to which Disney is not required to respond. To the extent that
5 Disney is required to respond, it denies each and every allegation in this paragraph.

6 595. The allegations of Paragraph 595 of the Complaint constitute
7 conclusions of law to which Disney is not required to respond. To the extent that
8 Disney is required to respond, it denies each and every allegation in this paragraph.

9 596. The allegations of Paragraph 596 of the Complaint constitute
10 conclusions of law to which Disney is not required to respond. To the extent that
11 Disney is required to respond, it denies each and every allegation in this paragraph.
12 The Prayer for Relief following Paragraph 596 of the Complaint contains no factual
13 assertions to which Disney is required to respond. To the extent the Prayer for Relief
14 may be deemed to require a response, Disney denies the allegations in this paragraph
15 (as well as the subparagraphs therein), and denies that monetary damages, litigation
16 costs, prejudgment interest or any other relief sought is appropriate or required.

17 597. Disney reincorporates its answers to Paragraphs 1 through 66 and 565
18 through 586 of the Complaint as though fully set forth herein in response to
19 Paragraph 597 of the Complaint.

20 598. The allegations of Paragraph 598 of the Complaint constitute
21 conclusions of law to which Disney is not required to respond. To the extent that
22 Disney is required to respond, it lacks sufficient information or belief to admit or
23 deny the allegations in Paragraph 598 of the Complaint, and on that basis denies
24 them.

25 599. Disney denies each and every allegation in Paragraph 599 of the
26 Complaint.

27 600. Disney denies the allegations in Paragraph 600 of the Complaint. The
28 Prayer for Relief following Paragraph 600 of the Complaint contains no factual

1 assertions to which Disney is required to respond. To the extent the Prayer for Relief
2 may be deemed to require a response, Disney denies each and every allegation in this
3 paragraph (as well as the subparagraphs therein), and denies that economic monetary
4 damages, litigation costs, prejudgment interest, or any other relief sought is
5 appropriate or required.

6 601. Disney reincorporates its answers to Paragraphs 1 through 66 and 565
7 through 586 of the Complaint as though fully set forth herein in response to
8 Paragraph 601 of the Complaint.

9 602. Disney lacks sufficient information or belief to admit or deny the
10 allegations in Paragraph 602 of the Complaint, and on that basis denies them.

11 603. The allegations of Paragraph 603 of the Complaint constitute
12 conclusions of law to which Disney is not required to respond. To the extent that
13 Disney is required to respond, it denies each and every allegation in this paragraph.

14 604. The allegations of Paragraph 604 of the Complaint constitute
15 conclusions of law to which Disney is not required to respond. To the extent that
16 Disney is required to respond, it denies each and every allegation in this paragraph.

17 605. Disney lacks sufficient information or belief to admit or deny the
18 allegations in the first sentence of Paragraph 605 of the Complaint, and on that basis
19 denies them. The remaining allegations of Paragraph 605 of the Complaint
20 constitute conclusions of law to which Disney is not required to respond. To the
21 extent that Disney is required to respond, it denies each and every allegation in this
22 paragraph.

23 606. The allegations of Paragraph 606 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it denies each and every allegation in this paragraph.
26 The Prayer for Relief following Paragraph 606 of the Complaint contains no factual
27 assertions to which Disney is required to respond. To the extent the Prayer for Relief
28 may be deemed to require a response, Disney denies each and every allegation in this

1 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
2 litigation costs, prejudgment interest or any other relief sought is appropriate or
3 required.

4 607. Disney reincorporates its answers to Paragraphs 1 through 66 and 565
5 through 586 of the Complaint as though fully set forth herein in response to
6 Paragraph 607 of the Complaint.

7 608. Disney lacks sufficient information or belief to admit or deny the
8 allegations in Paragraph 608 of the Complaint, and on that basis denies them.

9 609. The allegations of Paragraph 609 of the Complaint constitute
10 conclusions of law to which Disney is not required to respond. To the extent that
11 Disney is required to respond, it denies each and every allegation in this paragraph.

12 610. The allegations of Paragraph 610 of the Complaint constitute
13 conclusions of law to which Disney is not required to respond. To the extent that
14 Disney is required to respond, it denies each and every allegation in this paragraph.

15 611. Disney lacks sufficient information or belief to admit or deny the
16 allegations in the first sentence of Paragraph 611 of the Complaint, and on that basis
17 denies them. The remaining allegations of Paragraph 611 of the Complaint
18 constitute conclusions of law to which Disney is not required to respond. To the
19 extent that Disney is required to respond, it denies each and every allegation in this
20 paragraph.

21 612. The allegations of Paragraph 612 of the Complaint constitute
22 conclusions of law to which Disney is not required to respond. To the extent that
23 Disney is required to respond, it denies each and every allegation in this paragraph.
24 The Prayer for Relief following Paragraph 612 of the Complaint contains no factual
25 assertions to which Disney is required to respond. To the extent the Prayer for Relief
26 may be deemed to require a response, Disney denies each and every allegation in this
27 paragraph (as well as the subparagraphs therein), and denies that monetary damages,
28 litigation costs, prejudgment interest or any other relief sought is appropriate or

1 required.

2 613. Disney reincorporates its answers to Paragraphs 1 through 66 and 68 of
3 the Complaint as though fully set forth herein in response to Paragraph 613 of the
4 Complaint.

5 614. Disney lacks sufficient information or belief to admit or deny the
6 allegations in Paragraph 614 of the Complaint, and on that basis denies them.

7 615. The allegations of Paragraph 615 of the Complaint constitute
8 conclusions of law to which Disney is not required to respond. To the extent that
9 Disney is required to respond, it lacks sufficient information or belief to admit or
10 deny the allegations in Paragraph 615 of the Complaint, and on that basis denies
11 them.

12 616. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 616 of the Complaint, and on that basis denies them.

14 617. Disney lacks sufficient information or belief to admit or deny the
15 allegations in Paragraph 617 of the Complaint.

16 618. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 618 of the Complaint, and on that basis denies them.

18 619. Disney lacks sufficient information or belief to admit or deny the
19 allegations in Paragraph 619 of the Complaint, and on that basis denies them.

20 620. Disney lacks sufficient information or belief to admit or deny the
21 allegations in Paragraph 620 of the Complaint, and on that basis denies them.

22 621. Disney lacks sufficient information or belief to admit or deny the
23 allegations in Paragraph 621 of the Complaint, and on that basis denies them.

24 622. Disney lacks sufficient information or belief to admit or deny the
25 allegations in Paragraph 622 of the Complaint, and on that basis denies them, except
26 that Disney specifically denies (with respect to the allegation regarding riding rides
27 that are circular in nature without waiting) that the DAS system is in any way
28 deficient in providing the level of accommodation required by law.

1 623. Disney denies each and every allegation in Paragraph 623 of the
2 Complaint.

3 624. Disney denies each and every allegation in Paragraph 624 of the
4 Complaint.

5 625. Disney denies the allegations in Paragraph 625 of the Complaint, except
6 Disney admits that the DAS card offers guests a return time for rides and attractions
7 based on the approximate current wait time minus ten minutes.

8 626. Disney lacks sufficient information or belief to admit or deny the
9 allegations in Paragraph 626 of the Complaint, and on that basis denies them, except
10 that Disney specifically denies the allegations in this paragraph that purport to
11 contrast the GAC system with the DAS system.

12 627. Disney lacks sufficient information or belief to admit or deny the
13 allegations in Paragraph 627 of the Complaint, and on that basis denies them, but
14 Disney admits that it works individually with guests with disabilities to provide
15 assistance that is responsive to their circumstances.

16 628. Disney lacks sufficient information or belief to admit or deny the
17 allegations in Paragraph 628 of the Complaint, and on that basis denies them, but
18 Disney specifically denies that J.B.W. and K.P.B. had an “un-accommodating”
19 experience during their November 2013 visit as a result of the DAS system, and also
20 denies the allegation and/or implication in this paragraph that Disney would not
21 accommodate J.B.W.

22 629. Disney denies the allegations in the first five sentences of paragraph 629
23 of the Complaint. Disney lacks sufficient information or belief to admit or deny the
24 allegations in the sixth and seventh sentences of this paragraph, and on that basis
25 denies them.

26 630. Disney lacks sufficient information or belief to admit or deny the
27 allegations in Paragraph 630 of the Complaint, and on that basis denies them.

28 631. Disney denies each and every allegation in Paragraph 631 of the

1 Complaint.

2 632. Disney denies the allegations in Paragraph 632 of the Complaint except
3 that Disney admits that it has knowledge and experience in accommodating guests
4 with cognitive impairments and that it has a long-standing, unwavering commitment
5 to providing a welcoming and inclusive environment and accessible experience for
6 guests with disabilities.

7 633. Disney denies the allegations in Paragraph 633 of the Complaint.

8 634. Disney denies the allegations in Paragraph 634 of the Complaint.

9 635. Disney lacks sufficient information or belief to admit or deny the
10 allegations in the first and third sentences and in the first part of the second sentence
11 of Paragraph 635 of the Complaint. Disney denies the allegations in the second part
12 of the second sentence and in the fourth sentence of this paragraph, and specifically
13 denies that K.P.B. and J.B.W. had an “unaccommodating” experience during prior
14 visits to Disney’s theme parks as a result of the DAS system. The Prayer for Relief
15 following Paragraph 635 of the Complaint contains no factual assertions to which
16 Disney is required to respond. To the extent the Prayer for Relief may be deemed to
17 require a response, Disney denies each and every allegation in this paragraph (as
18 well as the subparagraphs therein), and denies that an injunction, remedial measures,
19 attorneys’ fees, litigation costs, or any other relief sought is appropriate or required.

20 636. Disney reincorporates its answers to Paragraphs 1 through 66 and 613
21 through 635 of the Complaint as though fully set forth herein in response to
22 Paragraph 636 of the Complaint.

23 637. The allegations of Paragraph 637 of the Complaint constitute
24 conclusions of law to which Disney is not required to respond. To the extent that
25 Disney is required to respond, it lacks sufficient information or belief to admit or
26 deny the allegations in Paragraph 637 of the Complaint, and on that basis denies
27 them.

28 638. Disney denies each and every allegation in Paragraph 638 of the

1 Complaint.

2 639. Disney denies the allegations in Paragraph 639 of the Complaint. The
3 Prayer for Relief following Paragraph 639 of the Complaint contains no factual
4 assertions to which Disney is required to respond. To the extent the Prayer for Relief
5 may be deemed to require a response, Disney denies each and every allegation in this
6 paragraph (as well as the subparagraphs therein), and denies that economic monetary
7 damages, litigation costs, prejudgment interest, or any other relief sought is
8 appropriate or required.

9 640. All allegations in the Complaint not specifically admitted are hereby
10 denied.

11 **AFFIRMATIVE DEFENSES**

12 Disney reserves the right to supplement or amend its Answer to include
13 additional affirmative defenses as additional information becomes available. In
14 setting forth the following “affirmative defenses,” Disney does not concede that it
15 has the burden of proof or production on any of them.

16 **FIRST AFFIRMATIVE DEFENSE**

17 The Complaint fails to state facts sufficient to constitute a claim or cause of
18 action upon which relief may be granted.

19 **SECOND AFFIRMATIVE DEFENSE**

20 The Complaint and each claim therein are barred by the applicable statute of
21 limitations.

22 **THIRD AFFIRMATIVE DEFENSE**

23 Plaintiffs’ claims are barred, in whole or in part, by payment, release, and/or
24 accord and satisfaction.

25 **FOURTH AFFIRMATIVE DEFENSE**

26 Plaintiffs have failed, neglected and/or refused to mitigate damages.

27 **FIFTH AFFIRMATIVE DEFENSE**

28 Plaintiffs’ claims are barred, in whole or in part, by the doctrines of unclean

1 hands, waiver, abandonment, laches, estoppel, and/or other equitable defenses.

2 **SIXTH AFFIRMATIVE DEFENSE**

3 Plaintiffs lack standing to assert any claims either individually or on behalf of
4 their next friend, parent and/or guardian.

5 **SEVENTH AFFIRMATIVE DEFENSE**

6 Plaintiffs have not been injured by Disney's conduct and do not have
7 standing to bring this action, and the Complaint should therefore be dismissed.

8 **EIGHTH AFFIRMATIVE DEFENSE**

9 Disney is absolved from any liability in the action filed by Plaintiffs because
10 of Disney's full compliance with all statutes, regulations, laws and standards in
11 effect at the time of the conduct which supposedly gave rise to the injuries alleged
12 to have occurred.

13 **NINTH AFFIRMATIVE DEFENSE**

14 Plaintiffs have waived the right, if any, to pursue any of the claims alleged in
15 the Complaint by reason of their own actions and course of conduct.

16 **TENTH AFFIRMATIVE DEFENSE**

17 Plaintiffs are estopped by their conduct from recovering any relief under the
18 Complaint.

19 **ELEVENTH AFFIRMATIVE DEFENSE**

20 All of Plaintiffs' claims are barred because reasonable use of Disney's
21 procedures would have prevented the harm that Plaintiffs allegedly suffered.

22 **TWELFTH AFFIRMATIVE DEFENSE**

23 Plaintiffs' claims should be barred to the extent Plaintiffs have failed to
24 request a modification of Disney's policies, practices or procedures.

25 **THIRTEENTH AFFIRMATIVE DEFENSE**

26 To the extent the Complaint, and any claim contained therein, alleges that
27 Disney failed to make modifications to policies, practices or procedures, it is barred
28 because any such modification is not reasonable.

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FOURTEENTH AFFIRMATIVE DEFENSE

To the extent the Complaint, and any claim contained therein, alleges that Disney failed to make modifications to policies, practices or procedures, it is barred because any such modification is not necessary to afford access to Disney’s theme parks.

FIFTEENTH AFFIRMATIVE DEFENSE

To the extent the Complaint, and any claim contained therein, alleges that Disney failed to make reasonable modifications to policies, practices or procedures that are necessary to afford the goods, services, facilities, privileges, advantages, or accommodations at Disney’s theme parks, it is barred because any such modification would fundamentally alter the nature of such goods, services, facilities, privileges, advantages or accommodations.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiffs’ claims are barred to the extent that Disney was not required under federal or state law to provide unlimited, repeated, immediate access to its rides and attractions as the only available accommodation for purposes of reasonably accommodating Plaintiffs’ alleged disability.

SEVENTEENTH AFFIRMATIVE DEFENSE

Any allegedly wrongful acts or omissions performed by Disney or their agents, if there were any, do not subject Disney to liability because it accommodated Plaintiffs’ alleged disability by providing services via alternative methods other than those demanded by Plaintiffs.

EIGHTEENTH AFFIRMATIVE DEFENSE

The Complaint fail to state facts sufficient to constitute a claim against Disney because any actions taken with respect to Plaintiffs were for legitimate, non-discriminatory business reasons unrelated to Plaintiffs’ alleged disability or other claimed protected status.

1 **NINETEENTH AFFIRMATIVE DEFENSE**

2 Disney and its agents acted reasonably and in good faith at all times material
3 herein, based on all relevant facts and circumstances known by them at the time
4 they acted. Accordingly, Plaintiffs are barred, in whole or in part, from any relief in
5 this action. Insofar as Disney has not modified the policies at issue that Plaintiffs
6 contend should have been made, those changes were not and are not required under
7 federal or state law, and any requirement to make those changes would impose an
8 undue burden upon Disney.

9 **TWENTIETH AFFIRMATIVE DEFENSE**

10 Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' injuries,
11 if any, were the result of Plaintiffs' pre-existing medical conditions and/or
12 disabilities.

13 **TWENTY-FIRST AFFIRMATIVE DEFENSE**

14 Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' injuries,
15 if any, resulted from the intervening, superceding and/or supervening actions of
16 others and were not proximately caused by the acts or omissions of Disney.

17 **TWENTY-SECOND AFFIRMATIVE DEFENSE**

18 The injuries alleged in the Complaint do not constitute severe emotional
19 distress under the applicable law.

20 **TWENTY-THIRD AFFIRMATIVE DEFENSE**

21 Disney is not responsible for Plaintiffs' alleged harm because Disney's
22 conduct was legally permissible.

23 **TWENTY-FOURTH AFFIRMATIVE DEFENSE**

24 The claim for punitive damages is barred because Plaintiffs cannot show that
25 Disney's alleged conduct was malicious, oppressive or fraudulent.

26 **TWENTY-FIFTH AFFIRMATIVE DEFENSE**

27 Plaintiffs are not entitled to punitive damages pursuant Ca. Civ. Code §
28 3294(a) to the extent their action arises from a breach of contract claim.

1 3. That Disney be awarded its costs of suit incurred herein, including
2 reasonable attorneys' fees; and

3 4. That Disney be awarded such other and further relief as this Court
4 deems just and proper.

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6 Dated: July 9, 2014

Respectfully submitted,

7
8 /s/ Rhonda Trotter
Rhonda Trotter

9 Counsel for Defendant Walt Disney Parks
10 and Resorts U.S., Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all Counsel of Record.

/s/ Rhonda Trotter
Rhonda Trotter

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