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

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 A.L., et al.,

13 Plaintiffs,

14 v.

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

17 Defendant.

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

**DECLARATION OF ALISON
ARMOR IN SUPPORT OF
DEFENDANT WALT DISNEY
PARKS AND RESORTS U.S.,
INC.'S MOTION TO TRANSFER
VENUE**

18
19 I, Alison Armor, hereby state and depose as follows:

20 1. My name is Alison Armor and I have personal knowledge of all
21 of the facts contained herein.

22
23 2. I am the Director of Park Operations and Lodging for Walt
24 Disney Parks and Resorts U.S., Inc. ("Disney"). I began my career at the Walt
25 Disney World Resort ("WDW") over 20 years ago.
26
27
28

1 3. I have personal knowledge of all of the facts contained herein
2 based on my involvement with the Disability Access Service (“DAS”) card program
3 and my review of documents kept in the ordinary course of Disney’s business.
4

5 4. I submit this declaration in support of Disney’s motion to transfer
6 venue to the Middle District of Florida.
7

8 5. I was involved in the creation, development and implementation
9 of the DAS card program. I work at WDW in Florida and reside in Florida. I report
10 to Mark Rucker who is Vice President of Park Operations and Lodging. Mr. Rucker
11 works and lives in Florida.
12

13 6. The DAS card program was designed primarily by Disney
14 employees at WDW in Florida. Additionally, the implementation (including
15 employee training) of the DAS card program at WDW theme parks took place in
16 Florida.
17

18 7. Greg Hale is Disney’s Chief Safety Officer and Vice President of
19 Worldwide Standards and Auditing. Mr. Hale is familiar with the development and
20 implementation of the DAS card program. Mr. Hale works and resides in Florida.
21

22 8. Teri Rosenfeld is the Director of Operations Training and works
23 at WDW. Ms. Rosenfeld is familiar with the training and operational guidelines
24 relating to the DAS card program. Ms. Rosenfeld works and resides in Florida.
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1 9. WDW's Guest Relations team, which is involved with ticketing,
2 guest requests, and other inquiries from guests at the parks, is located at WDW in
3 Florida. Scot Reynolds is Director of WDW Parks Guest Relations Services &
4 Program Management, and he works and resides in Florida. Steve Riggs is Area
5 Manager, Guest Relations for Magic Kingdom, and he works and resides in Florida.
6 Mr. Reynolds and Mr. Riggs are familiar with the administration of the DAS card
7 program at WDW.
8

10 10. WDW's Park Operations department is located at WDW in
11 Florida. Chris Lutz is the General Manager of Park Operations at Animal Kingdom
12 and was General Manager of Park Operations at Magic Kingdom when the DAS card
13 program replaced the Guest Assistance Card program on October 9, 2013. Mr. Lutz
14 was involved in the development and implementation of the DAS card program at
15 WDW and is familiar with the administration of the program at both Magic Kingdom
16 and Animal Kingdom. Mr. Lutz works and resides in Florida.
17

19 11. There are several other Disney executives and managers who
20 were closely involved in the development and implementation of the DAS card
21 program at WDW, who work and reside in Florida, including but not limited to (a)
22 Tim Sypko, Director of Parks & Lodging, (b) Josh D'Amaro, Vice President of Park
23 Operations for Animal Kingdom, and (c) Sarah Riles, Director of Industrial
24 Engineering.
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1 12. Most, if not all, of the front-line employees (such as ride
2 operators and guest relations personnel) with whom the plaintiffs would have
3 interacted at WDW live and work in Florida. Many of these employees have short-
4 term jobs.
5

6 13. Justin Michelena (whose stage name is Justin Patterson) is an
7 employee in WDW's Guest Experience Services department, and he works and lives
8 in Florida.
9

10 14. Upon information and belief, most of the documents relating to
11 the DAS card program at WDW are located and maintained in Florida.
12

13 15. Attached hereto as **Exhibit A** is a true and correct copy of a
14 standard RFID ticket for WDW.
15

16 16. Attached hereto as **Exhibit B** is a true and correct copy of an
17 annual pass for WDW.
18

19 I declare under penalty of perjury that the foregoing is true and correct
20 to the best of my knowledge and belief.
21

22 Executed on this 29 day of July, 2014 in Orange County, Florida.
23


24 
Alison Armor
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EXHIBIT A

NONREFUNDABLE • NOT FOR RESALE • VOID IF ALTERED • REVOCABLE • ADMIT ONE • @DISNEY



Scan this QR code—or visit disneyworld.com/mobileapp—to download the *My Disney Experience* mobile app or link this ticket to your account.

If this card includes admission rights, it is a nontransferable ticket and it is: **NONTRANSFERABLE; MUST BE USED BY THE SAME PERSON ON ALL DAYS.** Disney is not responsible for lost or stolen tickets. Parks, attractions or entertainment may change operating hours; close due to refurbishing, capacity, weather or special events; and may otherwise change or be discontinued without notice and without liability to the owners of the *Walt Disney World* Resort Ticket and Ticket Tag biometric confirmation required for entry. Not valid for special or premium events or other activities which are separately priced or for any park commencing operations after May 1, 1998. It is agreed between owners of the *Walt Disney World* Resort and ticket users that all claims for injury or loss arising incident to presence on owners' property shall be litigated in Florida. This card interacts with radio frequency technology. For information, visit disneyworld.disney.go.com/faq/my-disney-experience/frequency-technology/

PLEASE PRINT NAME HERE FOR IDENTIFICATION PURPOSES

REFER TO RECEIPT FOR TICKET NAME

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EXHIBIT B

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If this card includes admission rights, it is a nontransferable ticket and it is: **NONTRANSFERABLE; MUST BE USED BY THE SAME PERSON ON ALL DAYS.** Disney is not responsible for lost or stolen tickets. Parks, attractions or entertainment may change operating hours; close due to refurbishing, capacity, weather or special events; and may otherwise change or be discontinued without notice and without liability to the owners of the **Wait Disney World**® Resort **Ticket and Ticket Tag** biometric confirmation required for entry. Not valid for special or premium events or other activities which are separately priced or for any park commencing operations after May 1, 1998. It is agreed between owners of the **Wait Disney World**® Resort and ticket users that all claims for injury or loss arising incident to entrance on owners' property shall be litigated in Florida. This card interacts with radio frequency technology. For information, visit disneyworld.disney.go.com/faqs/my-disney-experience/frequency-technology/

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