

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

CIRCUIT CIVIL DIVISION

CASE NO.: 2021-CA-006496-O

J.Z., a minor, by and through her natural  
parents and next friends, TIFFINEY and  
RICHARD ZINGER; TIFFINEY and RICHARD  
ZINGER, individually; H.R., a minor, by and  
through her natural parents and next friends,  
GEISY MORENO and JOEL RODRIGUEZ;  
and GEISY MORENO and JOEL  
RODRIGUEZ, individually,

Plaintiffs,

vs.

UNIVERSAL CITY DEVELOPMENT  
PARTNERS, LTD., a Florida for-Profit Limited  
Partnership, d/b/a Universal Orlando, d/b/a  
Universal Studios,

Defendant.

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**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT**

Plaintiffs J.Z., a minor, by and through her natural parents and next friends, TIFFINEY and RICHARD ZINGER; TIFFINEY and RICHARD ZINGER, individually; H.R., a minor, by and through her natural parents and next friends, GEISY MORENO and JOEL RODRIGUEZ; and GEISY MORENO and JOEL RODRIGUEZ, individually, through undersigned counsel and pursuant to Florida Rules of Civil Procedure, hereby request the following:

1. Copy of any contract between Universal City Development Partner, Ltd. and Loews Royal Pacific Resort related to the breakfast event at Loews Royal Pacific Resort that was the subject of the Complaint on March 23, 2019.
2. The full personnel file of the person dressed as Gru and depicted in photographs A and B (attached).

3. Incident Reports for allegations of workers, while working for Defendant, treating people in a discriminatory manner based on a person's race, color, national origin, language or disability during the years of 2018 to present.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the following will be served with the initial summons and complaint.

*/s/ Lisa A. Riddle*

Lisa Riddle, Esq.  
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**Exhibit A**



**Exhibit B**