

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

CASE NO:

JEFFREY J. PICCOLO as Personal
Representative of the estate of KANOKPORN
TANGSUAN, Deceased,

Plaintiff,

vs.

GREAT IRISH PUBS FLORIDA, Inc., a
Florida corporation d/b/a RAGLAN ROAD
IRISH PUB AND RESTAURANT and WALT
DISNEY PARKS AND RESORTS U.S., Inc.,
a Florida corporation d/b/a DISNEY
SPRINGS,

Defendants.

_____ /

COMPLAINT

COMES NOW the Plaintiff, JEFFREY J. PICCOLO as Personal Representative of the estate of KANOKPORN TANGSUAN, Deceased, and hereby sues the Defendants, GREAT IRISH PUBS FLORIDA, Inc., a Florida corporation d/b/a RAGLAN ROAD IRISH PUB AND RESTAURANT and WALT DISNEY PARKS AND RESORTS U.S., Inc., a Florida corporation d/b/a DISNEY SPRINGS, and alleges:

1. This is an action for damages which exceeds the sum of Fifty Thousand Dollars (\$50,000.00) and is being brought pursuant to the Florida Wrongful Death Act, Florida Statutes §768.16 — §768.26.

2. At all times material hereto, JEFFREY J. PICCOLO was legally married to KANOKPORN TANGSUAN.

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3. JEFFREY J. PICCOLO was appointed the Personal Representative of the estate of KANOKPORN TANGSUAN in Orange County, Florida (hereinafter "THE ESTATE OF KANOKPORN TANGSUAN").

4. At all times material hereto, JEFFREY J. PICCOLO was and is a resident of the State of New York.

5. At all times material hereto, GREAT IRISH PUBS FLORIDA, Inc., d/b/a RAGLAN ROAD IRISH PUB AND RESTAURANT (hereinafter "RAGLAN ROAD"), was and is a Florida corporation duly organized and existing under the laws of the State of Florida with a principal place of business located in Orange County, Florida.

6. At all times material hereto, Defendant, RAGLAN ROAD, was and is conducting substantial business in the State of Florida and specifically, Orange County, Florida.

7. At all times material hereto, Defendant WALT DISNEY PARKS AND RESORTS U.S., INC. d/b/a DISNEY SPRINGS, (hereinafter "DISNEY") was and is a Florida corporation duly organized and existing under the laws of the State of Florida with a principal place of business located in Orange County, Florida.

8. At all times material hereto, Defendant, DISNEY, was and is conducting substantial business in the State of Florida and specifically, Orange County, Florida.

9. Upon information and belief, Defendant, DISNEY, was the owner and/or beneficial owner, and in possession, custody and control of the premises located at 1486 Buena Vista Drive, Orlando, Orange County, Florida 32830 known and marketed to the public as "Disney Springs."

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10. Disney Springs is an outdoor dining, shopping and entertainment complex located at/on DISNEY property.

11. Upon information and belief, DISNEY had control over the menu of food offered, the hiring and/or training of the wait staff, and the policies and procedures as it pertains to food allergies at DISNEY SPRINGS restaurants, such as RAGLAN ROAD.

12. Upon information and belief, DISNEY and/or RAGLAN ROAD were responsible for the serving of food containing allergens to KANOKPORN TANGSUAN at RAGLAN ROAD.

13. DISNEY advertises and represents to the public that food allergies and/or the accommodation of persons with food allergies is a top priority at its parks and resorts, including DISNEY SPRINGS and that patrons/guests may consult with a chef or special diets trained Cast Member before placing an order, and at all times material, Plaintiff relied upon these representations in selecting DISNEY SPRINGS/RAGLAN ROAD for dinner.

14. DISNEY publicly promotes DISNEY SPRINGS as part of WALT DISNEY PARKS AND RESORTS U.S., INC., and at all times material, Plaintiff relied upon these representations in selecting DISNEY SPRINGS/RAGLAN ROAD for dinner.

15. RAGLAN ROAD advertises and represents to the public that food allergies and/or the accommodation of persons with food allergies is a top priority and that patrons/guests may consult with a chef or special diets trained Cast Member before placing an order, and at all times material, Plaintiff relied upon these representations in selecting DISNEY SPRINGS/RAGLAN ROAD for dinner.

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16. At all times material, KANOKPORN TANGSUAN was highly allergic to dairy and nuts.

17. Venue is proper in Orange County Circuit Court because the facts giving rise to this action occurred in Orange County, Florida.

FACTS GIVING RISE TO THE ALLEGATIONS

18. On or about the evening of October 5, 2023, KANOKPORN TANGSUAN, her spouse, JEFFREY PICCOLO and JEFFREY PICCOLO's mother, Jackie Piccolo, entered RAGLAN ROAD located within DISNEY SPRINGS for dinner.

19. KANOKPORN TANGSUAN and JEFFREY PICCOLO chose to eat at RAGLAN ROAD in DISNEY SPRINGS because they believed that DISNEY would have proper safeguards to protect patrons such as KANOKPORN TANGSUAN from food allergens. This belief was based upon representations made by DISNEY and RAGLAN ROAD.

20. At all times material, KANOKPORN TANGSUAN was a medical doctor at NYU Langone in New York and knew she had a severe allergy to dairy and nuts.

21. On October 5, 2023, KANOKPORN TANGSUAN and her family were seated at RAGLAN ROAD restaurant in DISNEY SPRINGS. When the waiter came to the table, KANOKPORN TANGSUAN and her husband, JEFFREY PICCOLO, advised the waiter that she had severe food allergies and required allergen free food.

22. KANOKPORN TANGSUAN and JEFFREY PICCOLO questioned the waiter about various items on the menu to confirm whether they had allergens in them or not.

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23. KANOKPORN TANGSUAN's waiter went to ask the chef whether certain foods could be made allergen free and then he returned to KANOKPORN TANGSUAN's table and confirmed that they could. He also guaranteed KANOKPORN TANGSUAN and JEFFREY PICCOLO that RAGLAN ROAD would prepare allergen free food for KANOKPORN TANGSUAN.

24. To be absolutely sure that allergen free food would be served, KANOKPORN TANGSUAN and JEFFREY PICCOLO questioned the waiter several more times to confirm the food KANOKPORN TANGSUAN was ordering was allergen free. The waiter unequivocally assured them that the food would be allergen free.

25. KANOKPORN TANGSUAN ordered the following items from the menu based on the waiter's guarantee that these food items would be allergen free: "Sure I'm Frittered (V)", "Scallop Forest", "This Shepherd Went Vegan (V)", and "Onion Rings".

26. When the waiter returned with KANOKPORN TANGSUAN's food, some of the items did not have allergen free flags in them and KANOKPORN TANGSUAN and JEFFREY PICCOLO once again questioned the waiter who, once again, guaranteed the food being delivered to KANOKPORN TANGSUAN was allergen free.

27. KANOKPORN TANGSUAN and her family consumed their meals at RAGLAN ROAD and at approximately 8:00 p.m., KANOKPORN TANGSUAN and Jackie Piccolo decided to go shopping at DISNEY SPRINGS while JEFFREY PICCOLO returned to their room with their leftover food.

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28. KANOKPORN TANGSUAN and Jackie separated to shop at different stores for a short while and at approximately 8:45 p.m., KANOKPORN TANGSUAN entered Planet Hollywood while suffering from a severe acute allergic reaction to the food served at RAGLAN ROAD.

29. KANOKPORN TANGSUAN began having severe difficulty breathing and collapsed to the floor.

30. 911 was called at approximately 8:46 p.m., and the dispatcher was advised by the 911 caller that KANOKPORN TANGSUAN was suffering from a severe allergic reaction and had emergently self-administered an epi-pen.

31. Meanwhile, Jackie Piccolo had attempted to call KANOKPORN TANGSUAN to meet back up with her, but KANOKPORN TANGSUAN did not answer.

32. Jackie Piccolo returned to the hotel to meet JEFFREY PICCOLO and during that time, Jackie Piccolo called KANOKPORN TANGSUAN again. This time, a person answered stating that KANOKPORN TANGSUAN was taken to a hospital and advised Jackie Piccolo to get to the hospital right away.

33. JEFFREY PICCOLO and Jackie Piccolo frantically rushed to the hospital where KANOKPORN TANGSUAN had been rushed to.

34. JEFFREY PICCOLO and Jackie Piccolo were put into a small room and were left wondering about KANOKPORN TANGSUAN's condition.

35. JEFFREY PICCOLO was later informed that his beloved wife, KANOKPORN TANGSUAN, had died.

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36. The medical examiner's investigation determined that KANOKPORN TANGSUAN's cause of death was as a result of anaphylaxis due to elevated levels of dairy and nut in her system.

COUNT I
NEGLIGENCE AGAINST GREAT IRISH PUBS FLORIDA, INC., A FLORIDA CORPORATION D/B/A RAGLAN ROAD IRISH PUB AND RESTAURANT

37. Plaintiff adopts and re-alleges paragraphs one (1) through thirty-six (36) and all of their subparts as if fully set forth herein.

38. Defendant, RAGLAN ROAD, owed a duty of care to its invitees/guests to ensure that food that was designated as allergen free and/or food that was requested to be prepared allergen free, was in fact free from allergens that would cause death or serious physical harm to guests with food allergies, such as KANOKPORN TANGSUAN, after being advised that she had a severe allergy to dairy and nuts.

39. KANOKPORN TANGSUAN and JEFFREY PICCOLO relied upon the RAGLAN ROAD's employees, agents, apparent agents, servants, waiters and/or staff's guarantee that the food served to KANOKPORN TANGSUAN at RAGLAN ROAD was allergen free.

40. At all times, RAGLAN ROAD is liable for the negligence of its employee cast-members, waiters, waitresses, chefs, managers, agents and/or apparent agents including, but not limited to, the employee cast-members, waiters, waitresses, chefs, and/or managers serving KANOKPORN TANGSUAN and her family.

41. Notwithstanding the duties owed, RAGLAN ROAD, breached its duties to KANOKPORN TANGSUAN, deceased, in the following ways:

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- a. RAGLAN ROAD failed to educate, train, and/or instruct its employees, waiters, waitresses, chefs, managers, workers, and/or cast-members to make sure food, indicated as allergen free and/or requested to be made allergen free, was in fact free of allergens;
- b. RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to warn KANOKPORN TANGSUAN that there were allergens in the food she ordered, prior to her consuming it;
- c. RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to prepare KANOKPORN TANGSUAN's food free of allergens as they said they would, as she and her husband requested multiple times;
- d. RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to prepare KANOKPORN TANGSUAN's food free of allergens as she and her husband requested multiple times, and
- e. RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to follow its own policies and procedures with respect to food preparation and/or food service at their restaurant.

42. As a direct and proximate result of the negligence of Defendant, RAGLAN ROAD, KANOKPORN TANGSUAN died.

43. As a direct and proximate result of the negligence of Defendant, RAGLAN ROAD, the estate of KANOKPORN TANGSUAN, and her survivor, JEFFREY PICCOLO, have incurred all the damages provided by Florida Wrongful Death Act, §768.21, Florida Statutes. The survivor of the estate of KANOKPORN TANGSUAN is JEFFREY PICCOLO, her spouse. The damages suffered include, but not limited to:

- a. mental pain and suffering, both past and future;

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- b. lost support and services, both past and future;
- c. loss of companionship and protection
- d. funeral expenses;
- e. loss of net accumulations to the estate, both past and future;
- f. medical expenses;
- g. loss of income.

WHEREFORE, Plaintiff, JEFFREY J. PICCOLO, as Personal Representative of the estate of KANOKPORN TANGSUAN, deceased, demands judgment for damages against Defendant, GREAT IRISH PUBS FLORIDA, Inc., a Florida corporation d/b/a RAGLAN ROAD IRISH PUB AND RESTAURANT, in excess of \$50,000.00 plus costs, post-judgment interest, and further demands trial by jury on all issues so triable.

COUNT II
NEGLIGENCE AGAINST WALT DISNEY PARKS AND RESORTS U.S., INC., A
FLORIDA CORPORATION D/B/A DISNEY SPRINGS

44. Plaintiff adopts and re-alleges paragraphs one (1) through thirty-six (36) and all of their subparts as if fully set forth herein.

45. Upon information and belief, Defendant, DISNEY, was the owner and/or beneficial owner, and in possession, custody and control of the premises located at 1486 Buena Vista Drive, Orlando, Orange County, Florida 32830 known and marketed to the public as “Disney Springs”.

46. Upon information and belief, DISNEY had control and/or right of control over the menu of food offered, the hiring and/or training of the wait staff, and the policies and procedures as it pertains to food allergies at DISNEY SPRINGS restaurants, such as RAGLAN ROAD.

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47. KANOKPORN TANGSUAN and JEFFREY PICCOLO relied upon the DISNEY and/or RAGLAN ROAD's employees, agents, apparent agents, servants, waiters and/or staff's guarantee that the food served to KANOKPORN TANGSUAN at RAGLAN ROAD was allergen free.

48. Defendant, DISNEY, owed a duty of care to its invitees/guests to ensure that food, that was designated as allergen free and/or food that was requested to be prepared allergen free, was in fact free from allergens that would cause death or serious physical harm to guests with food allergies, such as KANOKPORN TANGSUAN.

49. At all times, DISNEY is liable for the negligence of its employee cast-members, waiters, waitresses, chefs, managers, agents, and/or apparent agents at RAGLAN ROAD including, but not limited to, the employee cast-members, waiters, waitresses, chefs, and/or managers serving KANOKPORN TANGSUAN and her family.

50. Notwithstanding the duties owed, DISNEY, breached its duties to KANOKPORN TANGSUAN, deceased, in the following ways:

- a. DISNEY failed to educate, train, and/or instruct its employees, waiters, waitresses, chefs, managers, workers, and/or cast-members to make sure food, indicated as allergen free on the menu and/or food requested to be made allergen free, was in fact free of allergens;
- b. DISNEY's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to warn KANOKPORN TANGSUAN that there were allergens in the food she ordered, prior to her consuming it;
- c. DISNEY's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to prepare KANOKPORN

TANGSUAN's food free of allergens as they said they would, as she and her husband requested multiple times;

- d. DISNEY's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to prepare KANOKPORN TANGSUAN's food free of allergens as she and her husband requested multiple times, and
- e. DISNEY's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members failed to follow its own policies and procedures with respect to food preparation and/or food service at RAGLAN ROAD.

51. As a direct and proximate result of the negligence of Defendant, DISNEY, KANOKPORN TANGSUAN died.

52. As a direct and proximate result of the negligence of Defendant, DISNEY, the estate of KANOKPORN TANGSUAN, and her survivor, JEFFREY PICCOLO, have incurred all the damages provided by Florida Wrongful Death Act, §768.21, Florida Statutes. The survivor of the estate of KANOKPORN TANGSUAN is JEFFREY PICCOLO, her spouse. The damages suffered include, but not limited to:

- a. mental pain and suffering, both past and future;
- b. lost support and services, both past and future;
- c. loss of companionship and protection;
- d. funeral expenses;
- e. loss of net accumulations to the estate, both past and future;
- f. medical expenses;
- g. loss of income.

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WHEREFORE, Plaintiff, JEFFREY J. PICCOLO, as Personal Representative of the estate of KANOKPORN TANGSUAN, deceased, demands judgment for damages against Defendant, WALT DISNEY PARKS AND RESORTS U.S., Inc., a Florida corporation d/b/a DISNEY SPRINGS, in excess of \$50,000.00 plus costs, post-judgment interest, and further demands trial by jury on all issues so triable.

COUNT III
NEGLIGENCE CLAIM FOR AGENCY AGAINST WALT DISNEY PARKS AND RESORTS U.S., INC., A FLORIDA CORPORATION D/B/A DISNEY SPRINGS

53. Plaintiff adopts and re-alleges paragraphs one (1) through forty-three (43) and all of their subparts as if fully set forth herein.

54. Defendant, DISNEY controlled the actions and/or had the right to control the actions of Defendant, RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members, as follows:

- a. By controlling or having the right to control the menu of food items served at RAGLAN ROAD;
- b. By controlling or having the right to control the hiring and/or training of RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members;
- c. By controlling or having the right to control the protocols and/or policies and procedures as it relates to the serving of food containing allergens at the RAGLAN ROAD restaurant;
- d. By controlling or having the right to control the protocols and/or policies and procedures as it relates to patrons/customers requesting food from the menu to be made/cooked without allergens at the RAGLAN ROAD restaurant, and

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- e. By controlling or having the right to control Defendant, RAGLAN ROAD's adherence to DISNEY's policies and procedures.

55. At all times material hereto, Defendant DISNEY, by and through its agents, servants, and/or employees, owed a duty to KANOKPORN TANGSUAN, to serve her food that did not contain allergens, as she and her husband requested multiple times.

56. Notwithstanding the duty undertaken, Defendant, DISNEY, by and through its agents working at RAGLAN ROAD located in DISNEY SPRINGS, did or failed to do one or more of the following acts, inter alia:

- a. DISNEY failed to educate, train, and/or instruct its agents at RAGLAN ROAD, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members to make sure food, indicated as allergen free on the menu and/or food requested to be made allergen free, was in fact free of allergens;
- b. DISNEY's agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to warn KANOKPORN TANGSUAN that there were allergens in the food she ordered, prior to her consuming it;
- c. DISNEY's agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to prepare KANOKPORN TANGSUAN's food free of allergens as they said they would, as she and her husband requested multiple times;
- d. DISNEY's agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to prepare KANOKPORN TANGSUAN's food free of allergens as she and her husband requested multiple times, and
- e. DISNEY's agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at

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RAGLAN ROAD failed to follow its own policies and procedures with respect to food preparation and/or food service at RAGLAN ROAD.

57. As a direct and proximate result of the negligence of Defendant, DISNEY, KANOKPORN TANGSUAN died.

58. As a direct and proximate result of the negligence of Defendant, DISNEY, the estate of KANOKPORN TANGSUAN, and her survivor, JEFFREY PICCOLO, have incurred all the damages provided by Florida Wrongful Death Act, §768.21, Florida Statutes. The survivor of the estate of KANOKPORN TANGSUAN is JEFFREY PICCOLO, her spouse. The damages suffered include, but not limited to:

- a. mental pain and suffering, both past and future;
- b. lost support and services, both past and future;
- c. loss of companionship and protection;
- d. funeral expenses;
- e. loss of net accumulations to the estate, both past and future;
- f. medical expenses;
- g. loss of income.

WHEREFORE, Plaintiff, JEFFREY J. PICCOLO, as Personal Representative of the estate of KANOKPORN TANGSUAN, deceased, demands judgment for damages against Defendant, WALT DISNEY PARKS AND RESORTS U.S., Inc., a Florida corporation d/b/a DISNEY SPRINGS, in excess of \$50,000.00 plus costs, post-judgment interest, and further demands trial by jury on all issues so triable.

COUNT IV
NEGLIGENCE CLAIM FOR APPARENT AGENCY AGAINST WALT
DISNEY PARKS AND RESORTS U.S., INC., A FLORIDA
CORPORATION D/B/A DISNEY SPRINGS

59. Plaintiff adopts and re-alleges paragraphs one (1) through thirty-six (36) and thirty-seven (37) through forty-three (43) and all of their subparts as if fully set forth herein.

60. At all times material, Defendant DISNEY had a duty independently, and by and through its apparent agents to provide food without allergens to KANOKPORN TANGSUAN, as she and her husband requested multiple times.

61. Defendant DISNEY is at all times vicariously liable for the negligent acts of its apparent agents, including by not limited to Defendant RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members acting within the course and scope of their apparent agency.

62. At all material times, Defendant DISNEY acknowledged and represented that RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members would act on behalf of Defendant DISNEY.

63. Defendant DISNEY made aforesaid acknowledgements and representations on their website regarding their commitment to providing allergen free food and/or accommodating patrons/customers with allergen free food at all of DISNEY's properties, including DISNEY SPRINGS, where the RAGLAN ROAD restaurant resides.

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64. Defendant, RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members served food on or about the premises exclusively owned, maintained and/or controlled by Defendant, DISNEY.

65. Defendant DISNEY's actions and expressions caused or allowed KANOKPORN TANGSUAN and JEFFREY PICCOLO to believe that the Defendant RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members were an apparent agent(s) of Defendant DISNEY.

66. KANOKPORN TANGSUAN and JEFFREY PICCOLO relied upon the representations of Defendant, DISNEY regarding the safety of the food at DISNEY SPRINGS/RAGLAN ROAD and chose to eat at RAGLAN ROAD in DISNEY SPRINGS based upon those representations.

67. KANOKPORN TANGSUAN and JEFFREY PICCOLO relied upon the representations of Defendant DISNEY such that the Defendant DISNEY created the appearance of an apparent agency relationship with the Defendant RAGLAN ROAD and its employees, waiters, waitresses, chefs, managers, workers, and/or cast-members.

68. KANOKPORN TANGSUAN and JEFFREY PICCOLO's reliance on Defendant DISNEY's representations caused detriment and/or death as follows:

- a. KANOKPORN TANGSUAN died after consuming food containing allergens at RAGLAN ROAD;
- b. KANOKPORN TANGSUAN would not have eaten at RAGLAN ROAD if she knew that RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members were not an actual agent(s) or employee(s) such that DISNEY would be vicariously liable for the negligent treatment rendered by

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RAGLAN ROAD's employees, waiters, waitresses, chefs, managers, workers, and/or cast-members.

69. Notwithstanding the duty undertaken, Defendant, DISNEY, by and through its apparent agents working at RAGLAN ROAD located in DISNEY SPRINGS, did or failed to do one or more of the following acts, inter alia:

- a. DISNEY failed to educate, train, and/or instruct its apparent agents at RAGLAN ROAD, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members to make sure food, indicated as allergen free on the menu and/or food requested to be made allergen free, was in fact free of allergens;
- b. DISNEY's apparent agents, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to warn KANOKPORN TANGSUAN that there were allergens in the food she ordered, prior to her consuming it;
- c. DISNEY's apparent agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to prepare KANOKPORN TANGSUAN's food free of allergens as they said they would, as she and her husband requested multiple times;
- d. DISNEY's apparent agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to prepare KANOKPORN TANGSUAN's food free of allergens as she and her husband requested multiple times, and
- e. DISNEY's apparent agents, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD failed to follow its own policies and procedures with respect to food preparation and/or food service at RAGLAN ROAD.

70. As a direct and proximate result of the negligence of the apparent agents of Defendant, DISNEY, including but not limited to, employees, waiters, waitresses, chefs,

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managers, workers, and/or cast-members at RAGLAN ROAD, KANOKPORN TANGSUAN died.

71. As a direct and proximate result of the negligence of the apparent agents of Defendant, DISNEY, including but not limited to, employees, waiters, waitresses, chefs, managers, workers, and/or cast-members at RAGLAN ROAD, the estate of KANOKPORN TANGSUAN, and her survivor, JEFFREY PICCOLO, have incurred all the damages provided by Florida Wrongful Death Act, §768.21, Florida Statutes. The survivor of the estate of KANOKPORN TANGSUAN is JEFFREY PICCOLO, her spouse. The damages suffered include, but not limited to:

- a. mental pain and suffering, both past and future;
- b. lost support and services, both past and future;
- c. loss of companionship and protection;
- d. funeral expenses;
- e. loss of net accumulations to the estate, both past and future;
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- g. loss of income.

WHEREFORE, Plaintiff, JEFFREY J. PICCOLO, as Personal Representative of the estate of KANOKPORN TANGSUAN, deceased, demands judgment for damages against Defendant, WALT DISNEY PARKS AND RESORTS U.S., Inc., a Florida corporation d/b/a DISNEY SPRINGS, in excess of \$50,000.00 plus costs, post-judgment interest, and further demands trial by jury on all issues so triable.

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DATED this 22nd day of February 2024.

/s/ Brian R. Denney

Brian R. Denney

Florida Bar No.: 299730

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