

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

CASE NO:

FABRICIO JAVIER SANCHEZ LOPEZ,

Plaintiff,

v.

WALT DISNEY PARKS AND  
RESORTS U.S., INC., a Florida  
corporation,

Defendant.

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**COMPLAINT**

Plaintiff, FABRICIO JAVIER SANCHEZ LOPEZ, by and through the undersigned attorneys, sues Defendant, WALT DISNEY PARKS AND RESORTS, U.S., INC., a Florida profit corporation, and states as follows:

**Jurisdiction and Venue**

- 1) This is an action for damages that exceeds Fifty Thousand Dollars (\$50,000.00), exclusive of interest, costs, and attorney's fees.
- 2) At all times material to this action, Plaintiff is and was a natural person residing in North Carolina.
- 3) At all times material to this action, Defendant is and was a Florida Corporation with its principal place of business located in Lake Buena Vista, Orange County, Florida.
- 4) Venue is proper in Orange County because that is the county in which the events giving rise to this Complaint occurred.

The Subject Incident

5) On or about November 24, 2023, Plaintiff was a business invitee at Defendant's premises located at 1180 Seven Seas Drive, Bay Lake, FL, commonly known as "Disney's Magic Kingdom". Plaintiff was attending the "Happily Ever After" fireworks show when he was struck in the eye by smoldering fireworks debris falling from the sky, causing significant injuries.

COUNT I – NEGLIGENCE

6) Plaintiff adopts Paragraphs 1 through 5 as if stated fully herein.

7) At all times material hereto, Defendant had a duty to its invitees, including Plaintiff, to operate the fireworks show in a reasonably safe manner, and to maintain its premises, including the grounds surrounding the fireworks show, in a responsibly safe condition for use by its invitees, and to warn its invitees of any hazards which Defendant knew or reasonably should have known through the exercise of reasonable care.

8) Defendant, breached its duties owed to Plaintiff, by committing one or more of the following acts or omissions:

- a. Negligently failing to operate the fireworks show in a reasonably safe manner, thus creating a foreseeable dangerous condition to business invitees, including Plaintiff;
- b. Negligently failing to maintain or adequately maintain the grounds surrounding the fireworks show, thus creating a foreseeable dangerous condition to business invitees, including Plaintiff;

- c. Negligently failing to warn or adequately warn Plaintiff and other business invitees of the danger of being struck by falling fireworks debris during and immediately following the fireworks show; and
- d. Negligently failing to account for wind or other weather related conditions to prevent Plaintiff and other business invitees from being struck by falling fireworks debris.

8) As a direct and proximate result of the negligence of Defendant, Plaintiff suffered serious bodily injury, resulting in pain and suffering, disability, disfigurement, permanent and significant scarring, mental anguish, loss of the capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, and aggravation of previous existing conditions. These losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

**COUNT II – STRICT LIABILITY FOR ULTRA-HAZARDOUS AND/OR INHERENTLY DANGEROUS ACTIVITY**

9) Plaintiff adopts Paragraphs 1 through 5 as if stated fully herein.

10) At all times material hereto, Defendant was engaged in the business of putting on professional fireworks shows, including the “Happily Ever After” fireworks show at Disney’s Magic Kingdom’s, for the entertainment of Defendant’s business invitees, including Plaintiff.

11) These fireworks shows involved significant quantities of explosives and pyrotechnics, which constitute ultra-hazardous and/or inherently dangerous activities.

12) As a direct and proximate result of Defendant’s ultra-hazardous and/or inherently dangerous activities, Plaintiff suffered serious bodily injury, resulting in pain and suffering, disability, disfigurement, permanent and significant scarring, mental anguish, loss of the capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment,

and aggravation of previous existing conditions. These losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

**WHEREFORE**, Plaintiff sues Defendant for damages and demands judgment in excess of Fifty Thousand Dollars (\$50,000.00), plus interest and costs, and demands trial by jury by all issues so triable.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a jury trial on all issues so triable for each and every one of the Counts set forth above.

**RESPECTFULLY** submitted this DATED this 31<sup>st</sup> day of October 2025.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have submitted via the Florida E-Portal, a true and correct copy of this filed on October 31, 2025. The complaint will be served on Defendant via service of process.

/s/ Ana M. Lopez  
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