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

CASE NO.:

IVANNA L. ORTIZ

PETITIONER

and/v.

STATE OF FLORIDA

RESPONDENTS.

_____/.

VERIFIED EMERGENCY PETITION FOR TEMPORARY INJUNCTION

RELIEF

COMES NOW the Petitioner, IVANNA LISETTE ORTIZ, pursuant to Florida Rule 1.610, Fla. R. Civ. P., and states the following:

I. PARTIES AND JURISDICTION

1. Plaintiff is a resident of Orange County, Florida, residing in close proximity to the Kia Center and/or exercising interest as a member of the affected community.

2. Respondent CITY OF ORLANDO is a Florida municipal government responsible of issuance and enforcement of special event and noise permits.

3. Defendant ORLANDO VENUES operates the Kia Center, a city-owned facility.

4. Live Nation, is the entity coordinating or sponsoring the BILLIE EILISH concert scheduled for 10/14/2025.

II. FACTUAL BACKGROUND

1. The concert event for BILLIE EILISH is scheduled to take place on October 14, 2025 at the Kia Center in Orlando, Florida.

2. Plaintiff requested public records relating to the issuance of special event and noise permits for this even on October 14, 2025 at 1400 o clock and as of the filing of this Petition, either:

   a) Has received no response, or

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b) Has reviewed records that show procedural defects, including one or more of the following:

i. Has received no response, or

ii. Has reviewed records that show procedural defects, including one or more of the following:

a. Lack of a valid special event permit

b. Absence of a loudspeaker/noise waiver under City Code Chapter 42

c. Failure to provide public notice to nearby residents as required by city guidelines.

d. Omission of required emergency access, traffic control, or security plans.

3. The concert is anticipated to result in noise levels exceeding local ordinance limits, disruption of public peace, and risks to public safety.

III. LEGAL GROUND FOR RELIEF



1. Plaintiff has a substantial likelihood of success on the merits because:
    i. The City and/or promoter violated procedural requirements under local and state law in authorizing the event.
    ii. Defendants failed to comply with Chapter 42, City of Orlando Code, regarding amplified noise, curfews, and residential impact.
    iii. Defendants failed to provide notice or obtain community consent as required.
2. Plaintiff and members of the surrounding community will suffer immediate and irreparable harm if the concert is allowed to proceed, including but not limited to:
    i. Loss of peaceful enjoyment of property
    ii. Noise-related medical symptoms for vulnerable residents (e.g., elderly, children)
    iii. Diminished public safety due to traffic, crowing, or emergency response gaps.

The balance of equities favors Plaintiff because the event can be postponed or relocated, whereas the community cannot recover from the violations.



The public interest is served by enforcing legal permit procedures and ensuring orderly, compliant use of public facilities.

IV. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

1. Enter a Temporary Restraining Order (TRO) enjoining the Defendants from holding the concert event on October 14, 2025 at the Kia Center;

2. Schedule a hearing on a Preliminary Injunction;

3. Order the immediate production of all permitting records and communications;

4. Award legal fees and filing costs.

5. Grant such other and further relief as this Court deems just and proper.



Respectfully submitted this 14th day of October, 2025.

I understand that I am swearing and affirming under oath the truthfulness of claims made in this notice and that the punishment for knowingly making a false statement includes fines and/or imprisonment. Under penalties of perjury, I declare that this document and the facts stated in it are true.

I certify that a copy of the foregoing Verified Petition for Injunction has been furnished by e-mail on this 14th day of October, 2025 to the following:

Live Nation Worldwide, Inc.
c/o CT Corporation System, Registered Agent
1200 S. Pine Island Road, Plantation, FL 33324
serviceofprocess@livenation.com

City of Orlando / Orlando Venues Division
400 S. Orange Avenue, Orlando, FL 32801
venues@orlando.gov

Orlando Police Department (Legal Division)
opdlegal@orlando.gov

Orange County Attorney's Office
legal@ocfl.net

FDOT District 5 Legal Counsel
D5-Legal@dot.state.fl.us



10/14/2025
Date

/s/ Ivanna Lisette Ortiz
Signature of Party filing this motion
Ivanna Lisette Ortiz, Plaintiff

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