



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA)
CLEVELAND COUNTY) S.S.
FILED In The
Office of the Court Clerk

JOYCE MCHENRY,)
)
 Plaintiff,)
)
 vs.)
)
 BOARD OF COUNTY)
 COMMISSIONERS OF CLEVELAND)
 COUNTY, CLEVELAND COUNTY)
 SHERIFF'S DEPARTMENT, and)
 CLEVELAND COUNTY DETENTION)
 CENTER,)
)
 Defendants.)

Case No.

OCT 31 2011

DOCKET _____ PAGE _____ RECORDED
Rhonda Hall, Court Clerk
DEPUTY

CJ-2011-1905 T.S.

ATTORNEY LIEN CLAIMED

PETITION

COMES now Plaintiff, Joyce McHenry, for her cause of action against Defendants, Board of County Commissioners of Cleveland County, Cleveland County Sheriff's Department and Cleveland County Detention Center, alleges and states:

GOVERNMENTAL TORT CLAIMS ACT

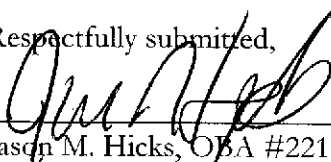
1. At all material times mentioned herein, the individual tortfeasors involved were employee(s), agent(s) and/or servant(s) for Defendant(s).
2. At all material times mentioned herein the individual tortfeasors involved were acting within the scope of their employment for Defendant(s).
3. The Plaintiff has complied with all requirements under the Oklahoma Governmental Tort Claims Act, 51 O.S. § 151 et.seq.
4. In accordance with the Oklahoma Governmental Tort Claims Act, 51 O.S. § 151 et. seq., the individual tortfeasors are not proper parties to this action and the named Defendants shall be liable for the torts of the individuals.

FIRST CAUSE OF ACTION: NEGLIGENCE

5. Plaintiff re-avers and incorporates paragraphs 1 through 4 as if fully restated herein.
6. On or about January 22, 2011, at the Plaintiff was lawfully on the premises of the Cleveland County Detention Center, a facility in Norman, Oklahoma.
7. Defendant(s) owed Plaintiff a duty to maintain the premises in a reasonably safe condition and to warn Plaintiff of dangerous conditions upon the premises, which are known or should have been reasonably known to the Defendant(s) but not to Plaintiff.
8. Defendant failed in its duty and failed to correct or warn Plaintiff of a dangerous condition then and there existing on Defendants' premises.
9. As a result of the negligence of Defendant(s) hereinbefore set forth, Plaintiff sustained serious and painful injuries and is entitled to recover damages for such personal injuries from Defendant(s).

WHEREFORE, Plaintiff, Joyce McHenry, prays for judgment against Defendants, , Board of County Commissioners of Cleveland County, Cleveland County Sheriff's Department and Cleveland County Detention Center for personal injuries and property damage in a sum in excess of \$75,000.00, for actual damages, plus interest, costs, and all such other and further relief as to which Plaintiff may be entitled.

Respectfully submitted,



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