

**IN THE DISTRICT COURT OF CADDO COUNTY
STATE OF OKLAHOMA**

JAMES IVAN SCOTT , Individually)	
and as GUARDIAN OF MARRY C. SCOTT ,)	
an incapacitate person, FATHER and)	
NEXT FRIEND of BRIAN CHELTON SCOTT ,)	
NOLAN RYAN SCOTT , and)	
HEATHER RENEE SCOTT , minors,)	
Plaintiff,)	
)	
v.)	Case No. CJ-2007-43
)	
BRYAN LOPEZ , individually and CADDO)	
ELECTRIC COOPERATIVE ,)	
Defendants.)	

PETITION

COMES NOW the Plaintiff, James Ivan Scott, Individually and as Guardian of Marry C. Scott, an incapacitate person, Father and Next Friend of Brian Chelton Scott, Nolan Ryan Scott, and Heather Renee Scott, minors, and for his first cause of action against the Defendants states:

First Cause of Action

1. On or about August 12, 2005, on State Highway152 and County Road, Caddo County, Oklahoma, Mary C. Scott was involved in an automobile accident proximately caused by the negligent acts of Bryan Lopez.

2. As a result of Defendant Lopez’s negligent acts Plaintiff, James Ivan Scott incurred property damage in excess of \$10,000.00, interest and costs for which Plaintiff prays judgment.

Wherefore Plaintiff, James Ivan Scott, prays damages against Defendants in excess of \$10,000.00, interest and costs.

Second Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. Mary C. Scott suffered severe and traumatic injuries; incurred medical expenses; will incur future medical expenses; lost time from work and lost income; permanent disabilities; disfigurement; has suffered in the past and will suffer in the future excruciating mental and physical pain and suffering, has suffered injuries which are permanent and progressive, all in a sum in excess of \$10,000.00.

Wherefore Plaintiff, James Ivan Scott, as Guardian of Marry C. Scott, an incapacitate person, prays judgment for damages against Defendants in excess of \$10,000.00.

Third Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. James Ivan Scott is the husband of Mary C. Scott. As a result of the injuries sustained by his wife, Mary C. Scott, James Ivan Scott has sustained damages in an amount in excess of \$10,000.00.

Wherefore Plaintiff, James Ivan Scott, Individually, prays judgment for damages against Defendants in a sum exceeding \$10,000.00.

Fourth Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. Brian Chelton Scott is a minor. This cause of action is brought by and on the behalf of Brian Chelton Scott by and through his father and next friend, James Ivan Scott. As a

result of the injuries sustained by his mother Brian Chelton Scott has also sustained damages. His actual damages exceed \$10,000.00.

Wherefore Plaintiff, James Ivan Scott, as next friend of Brian Chelton Scott, a minor, prays judgment for damages against Defendants in a sum exceeding \$10,000.00.

Fifth Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. Nolan Ryan Scott is a minor son of Mary C. Scott. This cause of action is brought by and on the behalf of Nolan Ryan Scott by and through his father and next friend, James Ivan Scott. As a result of the injuries sustained by his mother Nolan Ryan Scott has also sustained damages. His actual damages exceed \$10,000.00.

Wherefore Plaintiff, James Ivan Scott, as next friend of Nolan Ryan Scott, a minor, prays judgment for damages against Defendants in a sum exceeding \$10,000.00.

Sixth Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. Heather Renee Scott is the minor daughter of Mary C. Scott. This cause of action is brought by and on the behalf of Heather Renee Scott by and through her father and next friend, James Ivan Scott. As a result of the injuries sustained by her mother, Heather Renee Scott has also sustained damages. Her actual damages exceed \$10,000.00.

Wherefore Plaintiff, James Ivan Scott, as next friend of Heather Renee Scott, a minor, prays judgment for damages against Defendants in a sum exceeding \$10,000.00.

Seventh Cause of Action

Plaintiff adopts by reference each and every allegation and fact stated in the First Cause of Action and further states:

1. At the time of the accident Defendant Bryan Lopez was an employee of Caddo Electric Cooperative and was acting within the scope of his employment. Therefore, Defendant Caddo Electric Cooperative is liable to the Plaintiff for the negligent acts of it's employee, Bryan Lopez, under the doctrine of *respondent superior*.

WHEREFORE, Plaintiff prays judgment against Defendants for damages exceeding \$10,000.00, all court costs incurred herein, including a reasonable attorney fee, and for such other relief as the Court may deem just and proper.

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**ATTORNEY LIEN CLAIMED
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