IN THE DISTRICT COURT OF OKLAHOMA COUNTY MAR ~ 2 2011 STATE OF OKLAHOMA

	PAIRICIA PRESLEY, COURT CLERK
CAREN RUSSELL, Individually and) DEPUTY
as Mother and Next Friend of N. R., a Minor,))
Plaintiffs,)
vs.	Case No - 2011 - 14 1
MEGANN WAKELEE SCOTT, D.D.S.,)
CHILDREN'S DENTAL CLINIC OF)
OKLAHOMA CITY, PLLC, a/k/a OKLAHOMA)·
SMILES DENTAL CENTERS OF SOUTH)
OKLAHOMA CITY,)
Defendants.)

PETITION

COMES NOW Plaintiff, Caren Russell, Individually and as Mother and Next Friend of N.R., a minor, for causes of action against defendants, Megann Wakelee Scott, D.D.S., Children's Dental Clinic of Oklahoma City, PLLC, a/k/a Oklahoma Smiles Dental Centers of South Oklahoma City, states:

- 1. Plaintiff, Caren Russell, is the mother and next friend of N.R., a minor.
- 2. On or about March 16, 2010, Defendant Megann Wakelee Scott,
 D.D.S., acting as an agent and employee of Children's Dental Clinic of Oklahoma
 City, PLLC, a/k/a Oklahoma Smiles Dental Centers of South Oklahoma City and
 while acting within the course and scope of her employment assaulted and battered
 N.R., a minor. Specifically, Megann Wakelee Scott, D.D.S. forcefully shoved a bite-

block in the minor's mouth and gagged the child with water. The child was unable to breath for a period of time.

3. Defendants Children's Dental Clinic of Oklahoma City, PLLC, a/k/a Oklahoma Smiles Dental Centers of South Oklahoma City knew or should have known of Megann Wakelee Scott's propensity to abuse child patients. Defendants Children's Dental Clinic of Oklahoma City, PLLC, a/k/a Oklahoma Smiles Dental Centers of South Oklahoma City negligently recruited, hired, trained and retained

Megann Wakelee Scott, D.D.S.

4. As a result of Defendants' conduct, N.R., a minor, has and will suffer pain of mind and body, and therefore has been damaged in an amount in excess of \$75,000.00. Additionally, Defendant's conduct was malicious, wanton and reckless warranting punitive damages in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs prays judgment against Defendants in an amount in excess of \$75,000.00 as authorized by law for actual and punitive damages, interest, costs, and such other relief as the Court deems just and proper.

Steven T. Horton, OBA #14589

Brent L. Neighbors, OBA# 15910 HORTON & NEIGHBORS, P.C.

114 N.W. 6th Street, Suite 201 Oklahoma City, OK 73102

(405) 606-8080 – Telephone

(405) 606-8088 – Fax Attorneys for Plaintiffs

ATTORNEY'S LIEN CLAIMED JURY TRIAL DEMANDED