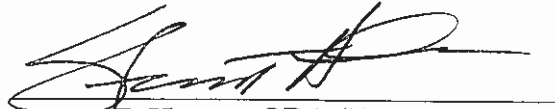


block in the minor's mouth and gagged the child with water. The child was unable to breath for a period of time.

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.



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**ATTORNEY'S LIEN CLAIMED
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