

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

ANDREW L. WISDOM

Plaintiff,

v.

JIM HALL, III

Defendant.

STATE OF OKLAHOMA)
CLEVELAND COUNTY) S.S. Case No. **CJ-2020-13**
FILED)
JAN 06 2020)
In the office of the JURY TRIAL DEMANDED
Court Clerk MARILYN WILLIAMS) ATTORNEY LIEN CLAIMED

PETITION

COMES NOW Plaintiff Andrew L. Wisdom by and through counsel Rand C. Eddy and for his cause of action against Defendant Jim Hall, III alleges and states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Andrew L. Wisdom (“Plaintiff”) is a twenty-one (21) year-old male resident of Oklahoma and student at the University of Oklahoma – Norman Campus.
2. Jim Hall, III (“Defendant”) is a resident of Cleveland County, Oklahoma and former employee of the University of Oklahoma.
3. All or the substantial part of the events giving rise to this action occurred in the County of Cleveland of the State of Oklahoma, giving this Court jurisdiction over this action.
4. Venue in this Court is proper as this is a civil action seeking damages in excess of \$10,000.00.

FACTUAL ALLEGATIONS

5. In the Fall of 2017, Plaintiff was a sophomore student at the University of Oklahoma (“OU”), and Defendant was an employee of OU.
6. Plaintiff became personally acquainted with Defendant in a reading group at the OU Honors College. The subject of the reading group was “acid,” lysergic acid diethylamide (LSD).
7. Between the Fall of 2017 and the Winter of 2018, Plaintiff and Defendant’s relationship grew to one of a personal nature.
8. Through the guise of mentorship and friendship, Defendant Hall maliciously manipulated Plaintiff into believing the relationship was appropriate. Under these pretenses, Plaintiff sought counsel from Defendant and shared personal information.
9. On January 8, 2019 Defendant sent a text message to Plaintiff to invite him to tea. In the text, Defendant stated: “just wanted to check on you.”
10. Defendant invited Plaintiff to join him at his residence in Norman, Oklahoma the following day, January 9, 2019.
11. Plaintiff went to Defendant’s house on January 9, 2019, and Defendant performed oral sex by placing Plaintiff’s penis in Defendant’s mouth for a prolonged period of time.
12. At no time did Plaintiff consent to engaging in a sex act with Defendant.

13. Defendant's actions placed Plaintiff in apprehension of an immediate harmful and offensive contact of his person which caused Plaintiff to suffer fright and terror.

14. Defendant's act of performing oral sex constitute and offensive and harmful contact of Plaintiff which caused Plaintiff to suffer harm.

15. Plaintiff has experienced prolonged severe emotional and physical pain and suffering as a direct consequence of Defendant's acts against him.

16. Plaintiff has sought medical treatment at a cost to he and his family to treat the injuries afflicted upon him by Defendant's aforementioned acts.

CAUSE OF ACTION

Sexual Assault and Battery

17. Plaintiff incorporates by reference the allegation contained in paragraphs 1-16 as if fully set forth herein.

18. This is a sexual assault and battery action presented by Plaintiff against Defendant.

19. Defendant sexually assaulted and battered Plaintiff on January 9, 2019.

20. This action seeks damages in excess of \$10,000.00 for the emotional and physical pain and suffering Plaintiff experienced and for the costs of medical care Plaintiff has incurred as a result of Defendant's aforementioned acts.

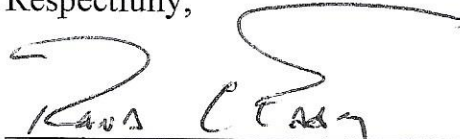
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays this Court award Plaintiff actual, compensatory, and punitive damages, in excess of \$75,000, together with any further legal and/or

equitable relief the Court deems appropriate under the law, including but not limited to Plaintiff's cost and attorneys' fees.

PRESENTED TO THE COURT THIS 6TH DAY OF JANUARY 2020

Respectfully,

A handwritten signature in black ink, appearing to read "Rand C. Eddy", written over a horizontal line.

Rand C. Eddy, OBA No. 11822
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