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## IN THE DISTRICT COURT IN AND FOR TULSA COUNTY F

SFP 10: MARJORIE ERIN JOHNSON. DON NEWBEREY an individual, and as parent STATE OF OKLA TU. and next friend of E.W., CJ-2024a minor. Plaintiffs. Case No. VS. KARL KING. an individual, ATTORNEY LIEN CLAIMED Defendant JURY TRIAL DEMANDED

## **PETITION**

COMES NOW the Plaintiff, Marjorie Erin Johnson, an individual, and as parent and next friend of E. W., a minor, and for their Petition, herein alleges and states the following against the Defendant Karl King:

- 1. That Plaintiffs are residents of Tulsa County, State of Oklahoma;
- 2. That it is Plaintiff's belief that Defendant Karl King is a resident of Tulsa County, State of Oklahoma;
- 3. That the Sexual Assault and Battery complained of herein occurred in Tulsa, Tulsa County, State of Oklahoma, at Glenpool Intermediate School;
- 4. That this Court has personal and subject matter jurisdiction over the parties and issues contained in this lawsuit;

## **FACTS ALLEGED**

- 5. On information and belief, E.W. was sexually assaulted and battered by her 5<sup>th</sup> grade math teacher, Karl King, at the Glenpool Intermediate School:
- 6. The minor E.W. disclosed this information to Marjorie Erin Johnson, her mother, in the second half of September 2023. The offending acts are believed to

have occurred shortly before then and within one (1) year of the filing of this action;

7. The offending acts were immediately reported to the school's principle. Yet, subsequently, Karl King was allowed to return to the classroom where he confronted Evelynn. A teacher in that classroom said to Evelynn "he's just trying to apologize". Karl King was allowed to simply resign his position;

8. Upon information and belief Karl King engaged in similar offensive acts at school(s) he previously was employed at;

9. As a direct result of the Defendant's acts, E.W. suffered physical assault, battery and a lifetime of emotional distress. Marjorie has suffered the loss her daughter's consortium, services, and incurred related expenses;

WHEREFORE, premises considered, the Plaintiffs, Marjorie Erin Johnson, individually, and as parent and next friend of E.W., a minor, is entitled to and prays for actual damages against the Defendant in excess of \$10,000,000.00, plus punitive damages, costs of this action and any other fee or cost the Court deems just and equitable.

Respectfully Submitted,

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