

IN THE DISTRICT COURT OF GRADY COUNTY
STATE OF OKLAHOMA

OCT 01 2026

MICKEY INGRAM,

Plaintiff,

v.

COLTER THORNBURG, individually,
GRADY COUNTY RURAL WATER
DISTRICT NO. 3, and J. DOES 1-5,

Defendants.

MICA HACKNEY, Court Clerk
By: *[Signature]* Deputy

Case No. CJ-2026-

337

PETITION

COMES NOW the Plaintiff, Mickey Ingram (hereinafter "Plaintiff"), by and through his counsel of record, and for his causes of action against Defendants Colter Thornburg (hereinafter "Defendant Thornburg"), Grady County Rural Water District No. 3 (hereinafter "Defendant Water District"), and J. Does 1-5, alleges and states as follows:

PARTIES

1. Plaintiff, Mickey Ingram, is a resident of 474 S. Terry Ave., Bradley, Oklahoma 73011, in Grady County, Oklahoma.
2. Defendant Thornburg is an individual who, upon information and belief, resides in Grady County, Oklahoma, with a mailing address of P.O. Box 11, Bradley, Oklahoma 73011.
3. Defendant Water District is a rural water district organized and existing under the laws of the State of Oklahoma, with a mailing address of P.O. Box 87, Bradley, Oklahoma 73011, and is a political subdivision subject to the Oklahoma Governmental Tort Claims Act.
4. At all times relevant herein, Defendant Thornburg was employed as the Operator of the Grady County Rural Water District No. 3 and was acting as an agent, employee, and representative of Defendant Water District.

5. J. Does 1-5 are unknown individuals and/or legal entities which, upon and information and belief, have some sort of joint venture, partnership or other business relationship with Defendant Thornburg and Defendant Water District, such that they are legally responsible for the errors and omissions of Defendant Thornburg and Defendant Water District and their employees, agents, representatives and joint venturers.

JURISDICTION AND VENUE

6. Plaintiff was injured on July 24, 2025, due to Defendants' acts and omissions in Grady County, Oklahoma.

7. This Court has jurisdiction over the parties and the subject matter of this action.

8. Venue is proper in Grady County, Oklahoma, where the incident giving rise to this action occurred and where the parties reside.

9. Plaintiff has complied with all conditions precedent to the filing of this action. Pursuant to the Oklahoma Governmental Tort Claims Act, OKLA. STAT. tit. 51, § 151 et seq., Plaintiff timely presented written notice of his tort claim to Defendant Water District on April 23, 2026. Defendant Water District failed to approve the claim within ninety (90) days, and the claim was therefore deemed denied by operation of law on July 22, 2026.

10. This action is commenced within one hundred eighty (180) days of the date the claim was deemed denied, as required by to OKLA. STAT. tit. 51, § 157(B). All conditions precedent to the maintenance of this action under the GTCA have been satisfied.

FACTUAL ALLEGATIONS

11. Plaintiff adopts and re-alleges paragraphs 1 through 10 as if fully set forth herein.

12. On July 24, 2025, at approximately 4:30 p.m., Plaintiff was at his home located at 474 S. Terry Ave., Bradley, Oklahoma, in Grady County, Oklahoma.

22. Defendant Thornburg while in the course and scope of his employment with Defendant Water District and/or J. Does 1-5, breached that duty when he attacked and struck Plaintiff in the face with a steel pipe wrench without provocation.

23. Plaintiff was catastrophically injured and his injuries were the direct and proximate result of Defendant Thornburg's negligent and reckless conduct.

24. All other Defendants are vicariously liable for the negligent acts and/or omissions of its agent and employee, Defendant Thornburg through the doctrine of *respondeat superior*.

25. As a direct and proximate result of Defendant Thornburg's conduct, Plaintiff has suffered serious and permanent injuries, physical impairment, physical disfigurement, physical pain and suffering, past and future, mental pain and suffering, past and future, and has incurred medical expenses.

26. As a direct and proximate result of the actions of Defendant Water District and/or J. Does 1-5 and Defendant Thornburg, individually and/or on behalf of Defendant Water District, constitute a deliberate disregard for the rights and safety of others, Plaintiff has suffered damages in an amount in excess of \$75,000.00 and is entitled to recover punitive damages.

COUNT II: RESPONDEAT SUPERIOR / VICARIOUS LIABILITY

(Defendant Water District and J. Does 1-5)

27. Plaintiff adopts and re-alleges paragraphs 1 through 26 as if fully set forth herein.

28. At all times relevant herein, Defendant Thornburg was employed by and acting as an agent, employee, and servant of Defendant Water District and/or J. Does 1-5 in his capacity as Operator of the Grady County Rural Water District No. 3.

29. Defendant Thornburg and Defendant Water District and/or J. Does 1-5 owed Plaintiff a duty to exercise ordinary care and to refrain from causing harm to Plaintiff.

30. Defendant Water District and/or J. Does 1-5 are vicariously liable for the acts and omissions of Defendant Thornburg committed within the course and scope of his employment through the doctrine of respondeat superior.

31. As a direct and proximate result of the acts and omissions of Defendants, Plaintiff has sustained serious, permanent, painful, and disabling bodily injuries, and has endured physical and mental pain and suffering, for which Plaintiff demands judgment in an amount in excess of \$75,000.00.

32. Plaintiff further alleges the acts and omissions of Defendant Water District and/or J. Does 1-5 and Defendant Thornburg were in reckless disregard of the rights of others and with malice toward others, supporting an award of punitive damages.

COUNT III: NEGLIGENT HIRING, RETENTION, AND SUPERVISION

(Defendant Water District and/or J. Does 1-5)

33. Plaintiff adopts and re-alleges paragraphs 1 through 32 as if fully set forth herein.

34. Defendant Water District and/or J. Does 1-5 had a duty to exercise ordinary care in the hiring, retention, training, and supervision of their employees, agents, and servants, including Defendant Thornburg, so as to protect members of the public such as Plaintiff from harm.

35. Prior to July 24, 2025, Defendant Thornburg had a documented criminal history that included multiple charges for assault and battery, among other offenses.

36. Defendant Water District and/or J. Does 1-5 knew or, in the exercise of ordinary care, should have known of Defendant Thornburg's dangerous propensities and unfitness to serve in a position that brought him into contact with members of the public.

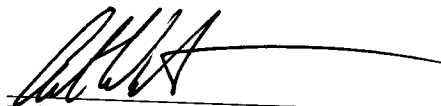
37. Defendant Water District and/or J. Does 1-5 were negligent in hiring and/or retaining Defendant Thornburg despite his dangerous propensities.

38. Defendant Water District and/or J. Does 1-5 was negligent in training and supervising Defendant Thornburg in the performance of his duties.

39. As a direct and proximate result of the negligence of Defendant Water District and/or J. Does 1-5 in the hiring, retention, training, and supervision of Defendant Thornburg, Plaintiff suffered serious and permanent injuries and is entitled to recover actual damages in an amount in excess of \$75,000.00.

WHEREFORE, premises considered, Plaintiff prays for judgment of this Court against Defendants for actual damages in an amount in excess of \$75,000.00 and in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code; for punitive damages against Defendant Thornburg for his willful, malicious, and reckless disregard of the rights of others; together with interest, costs, attorney fees, and for such other relief to which he may be entitled and which is deemed equitable and just by the Court.

Respectfully Submitted,



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