

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JIM SISNEY, an individual, )  
)  
Plaintiff, )  
)  
vs. )  
)  
INDEPENDENT SCHOOL DISTRICT )  
NO. 3 OF TULSA COUNTY, a Political )  
Subdivision; and the BROKEN ARROW )  
SCHOOL BOARD, )  
)  
)  
Defendants. )

Case Number: 09-CV-253-TCK-PJC

**PLAINTIFF’S SUPPLEMENTAL RULE 26 DISCLOSURES**

COMES NOW the Plaintiff, Jim Sisney, by and through his Attorneys of record, Gary L. Richardson and Charles L. Richardson of Richardson Richardson Boudreaux, hereby provides the Defendants with the Supplemental Initial Disclosures set forth below. If Plaintiff becomes aware of any additional information or documents that are subject to disclosure pursuant to Rule 26 (a) (1), it will supplement these disclosures to the extent required by the applicable rules.

**(C) Computation of Damages and Supporting Documents**

A complete computation of any category of Plaintiffs’ damages has not been formulated at this point in time. However, pursuant to Rule 26(a)(1)(A)(iii), Plaintiff asserts that he is seeking the recovery of compensatory damages in the amount of \$ 2,500,000.00. Plaintiff asserts that he is seeking the recovery of punitive damages in the amount of \$ 2,500,000.00.

1. Damages to include compensation for:
  - Loss of earnings;
  - Diminished earning capacity;
  - Mental pain and suffering, past and future;
  - Medical costs for care, treatment and service, past and future;
  - Pre-judgment and post-judgment interest; and
  - Any and all other damages that this Court deems proper and reasonable based upon the evidence submitted at the time of trial.
2. Relevant documents will be provided to Defendant accordingly.

Respectfully submitted,



/s/ Gary L. Richardson

Gary L. Richardson, OBA# 7547

Charles L. Richardson, OBA# 13388

**RICHARDSON RICHARDSON BOUDREAUX**

6450 S. Lewis, Suite 300

Tulsa, Oklahoma 74136

Tel: 918/492-7674

Fax: 918/493-1925

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 21<sup>st</sup> day of September, 2009, a true and correct copy of the foregoing instrument was properly transmitted to:

Kent B. Rainey

**ROSENSTEIN, FIST & RINGOLD**

525 South Main, Suite 700

Tulsa, Oklahoma 74103

*Attorneys for Defendants*

/s/ Gary L. Richardson

**RICHARDSON RICHARDSON BOUDREAUX**