



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY  
STATE OF OKLAHOMA

INTERNATIONAL ASSOCIATION OF )  
FIREFIGHTERS, LOCAL 176, a labor )  
organization, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
THE CITY OF TULSA, OKLAHOMA, )  
a municipal corporation )  
 )  
Defendants. )

DISTRICT COURT  
**FILED**

JAN 17 2023

DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

Case No. CV-2022-02613  
Judge Kelly M. Greenough

**DEFENDANT CITY OF TULSA'S ANSWER TO PLAINTIFFS' PETITION**

The Defendant, City of Tulsa ("City"), hereby appears by and through its attorneys, T. Michelle McGrew, Senior Assistant City Attorney, and Hayes T. Martin, Assistant City Attorney, Office of the City Attorney, City of Tulsa, and except for those allegations expressly admitted, denies each and every allegation contained in Plaintiffs' Petition.

1. The City admits the allegations in Paragraph 1 of Plaintiff's Petition.
2. The City admits that Plaintiff requested information from the City under the Oklahoma Open Records Act but denies, upon information and belief, the remaining allegations in Paragraph 2 of Plaintiff's Petition.
3. The City admits the allegations in Paragraph 3 of Plaintiff's Petition.
4. The City lacks sufficient information at this time to admit or deny the allegations in Paragraph 4 of Plaintiff's Petition, thus the City denies the allegations.

The City denies Plaintiff is entitled to the relief requested.

**AFFIRMATIVE DEFENSES**

The City's defenses include, but are not limited to:

1. The City incorporates its defenses and objections raised in its Answer to the Petition.

2. Plaintiffs' Petition fails to comply with 12 O.S. §2010(B).

The City reserves the right to amend its answers and defenses up to and including at time of Pretrial, as appropriate, and as justice requires. The City may amend its answers and defenses in and during Discovery rather than filing a formal pleading.

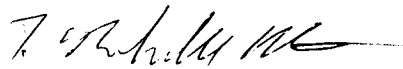
WHEREFORE, the City of Tulsa requests that the Court dismiss Plaintiffs' Petition and award judgment to the City with costs and any other such relief as the Court deems appropriate.

Respectfully Submitted,

CITY OF TULSA,  
a municipal corporation

JACK C. BLAIR,  
City Attorney

BY:

  
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T. Michelle McGrew, OBA # 20279  
Sr. Assistant City Attorney  
Hayes T. Martin, OBA # 32059  
Assistant City Attorney  
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(918) 596-7717 Telephone  
(918) 596-9700 Facsimile  
ATTORNEYS FOR CITY OF TULSA

**CERTIFICATE OF MAILING**

I, T. Michelle McGrew, hereby certify that on the 1<sup>st</sup> day of January 2023, I mailed a true and correct copy of the above and foregoing document, by first class mail with proper postage thereon fully prepaid, to:

Steven R. Hickman  
1700 Southwest Blvd.  
Tulsa, OK 74107  
Phone: (918) 584-4724  
Fax: (918) 583-5637  
E-mail: [frasier@tulsa.com](mailto:frasier@tulsa.com)



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T. Michelle McGrew