

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

MINA WOODS, as administrator for the ESTATE OF QUADRY MALIK SANDERS	:	
	:	
	:	
Plaintiffs,	:	CA No. CIV-22-596-D
v.	:	
	:	
	:	
POLICE OFFICER ROBERT HINKLE, and POLICE OFFICER NATHAN RONAN, and CITY OF LAWTON	:	JURY TRIAL DEMANDED
	:	
Defendants.	:	

PLAINTIFF'S ORIGINAL COMPLAINT

COMES NOW the Plaintiff, Mina Woods, by and through her attorneys of record, William R. Higgins, and Kevin A. Easley, of Higgins & Easley, and Mark V. Maguire of McEldrew, Young, Purtell & Merritt complaining of Defendants Police Officer Robert Hinkle and Police Officer Nathan Ronan and the City of Lawton Oklahoma states and would show the Honorable Court as follows:

NATURE OF THE ACTION

1. On December 5, 2021, Plaintiff's decedent Quadry Malik Sanders was shot and killed by Police Officers Robert Hinkle and Nathan Ronan outside his home. Mr. Sanders was unarmed, compliant, and posed no threat to the officers when he was shot.
2. The Defendant officers' use of lethal force was unreasonable and therefore violated Mr. Sanders' rights under the Fourth Amendment of the United States Constitution.
3. Plaintiff's claims are brought pursuant to 42 U.S.C. § 1983 and Oklahoma state law.

PARTIES

4. Plaintiff, Mina Woods is the mother of Quadry Malik Sanders and the duly appointed administrator of his estate and is an adult individual and a resident of the State of Texas.
5. Defendant Police Officer Robert Hinkle was at all relevant times a duly appointed officer with the Lawton Police Department. He is sued in his individual and official capacity.
6. Defendant Police Officer Nathan Ronan was at all relevant times a duly appointed officer with the Lawton Police Department. He is sued in his individual and official capacity.
7. Defendant City of Lawton is a municipality duly organized under Oklahoma Law and is responsible for the oversight and operation of the Lawton Police Department including tactical operations, training, discipline, supervision, and screening.

JURISDICTION AND VENUE

8. Jurisdiction exists in this Honorable Court pursuant to 28 U.S.C. §§ 1331 and 1343 as this action is brought pursuant to 42 U.S.C. § 1983 to redress a deprivation of the Fourth Amendment rights of the decedent Quadry Malik Sanders. Plaintiff further invokes the supplemental jurisdiction of this Court pursuant to 28 U.S.C. § 1367 to adjudicate pendent state law claims.
9. Venue is proper in this Honorable Court as Defendants' constitutional violations and intentional torts and otherwise violative conduct occurred within the Western District of Oklahoma.

FACTUAL ALLEGATIONS

10. On December 5, 2021, at approximately 8:30 p.m., Lawton Police Department received 911 call alleging that Plaintiff's decedent, Quadry Malik Sanders, was inside the residence at 1806 NW Lincoln Avenue, Lawton Oklahoma in violation of a protective

Order.

11. Lawton Police Officers Robert Hinkle and Nathan Ronan were dispatched to the address identified in the 911 call.
12. Officer Hinkle, Officer Ronan, and other police personnel announced their presence by way of loudspeaker and requested that Mr. Sanders exit the house.
13. Mr. Sanders briefly exited the side of the house, complied with the officers' orders, then returned inside the house.
14. Mr. Sanders then exited the front door. The interaction that followed was captured on Officer Hinkle's body-worn camera and published by the City of Lawton at the following location: <https://www.youtube.com/watch?v=TG0TMKrSLYY>
15. Mr. Sanders was unarmed when he exited the home.
16. Both of Mr. Sanders' hands were visible and did not contain weapons when he exited the home.
17. Mr. Sanders put hands up in a manner universally understood by police officers to be a sign of compliance.
18. Despite this compliance, Officer Hinkle, and Officer Ronan repeatedly shot Mr. Sanders while screaming "HANDS!"
19. Sanders suffered multiple gunshot wounds and fell to the ground.
20. Officer Hinkle, and Officer Ronan continued to discharge their firearms as the unarmed Mr. Sanders writhed in agony on the ground.
21. Mr. Sanders repeatedly stated that he was down then gasped that he couldn't breathe.
22. Officer Hinkle grabbed Mr. Sanders by his feet and dragged him along the ground, leaving a trail of blood.

23. Mr. Sanders was placed in handcuffs behind his back and placed in a prone position.
24. As Mr. Sanders moaned and wailed in agony and blood poured from his gunshot wounds, Officer Hinkle yelled at him to “quit moving,” and “quit reaching.”
25. Neither Officer Hinkle nor Officer Ronan attempted to render aid despite the obvious seriousness of his medical needs as evidenced by the trail of blood that was left when Mr. Sanders was dragged on the ground, his difficulty breathing, and the blood pooling beneath his body.
26. As a direct and proximate result of Officer Hinkle and Officer Ronan’s conduct, actions, and inactions, Mr. Sanders’ civil rights were violated, which caused him to suffer catastrophic personal injury, pain and suffering, mental anguish, and death.

WRONGFUL DEATH AND SURVIVAL ACTION
12 Okla. Stat. §1051, 12 Okla. Stat. §1053

27. Plaintiff Mina Woods hereby brings a Claim pursuant to 12 *Okla. Stat.* §1051 and 12 *Okla. Stat.* §1053.
28. The actions of the Defendants, Robert Hinkle and Nathan Ronan caused the death of Quadry Malik Sanders.
29. Plaintiff Mina Woods claims all available damages under the Oklahoma Wrongful Death Statute for financial contributions and the loss of future services, support, society, comfort, affection, and contribution that the Plaintiff’s decedent, Quadry Malik Sanders would have rendered but for his traumatic, untimely, and unnatural death.
30. Plaintiff Mina Woods claims damages for payment for all medical expense, funeral expenses, and burial expenses.

COUNT I: EXCESSIVE FORCE 42 U.S.C. § 1983

Mina Woods v. Police Officer Robert Hinkle and Police Officer Nathan Ronan

31. Plaintiffs incorporate all allegations set forth above as if fully set forth herein.
32. Defendants Robert Hinkle and Nathan Ronan intentionally discharged their firearms at Quadry Malik Sanders.
33. Defendants Robert Hinkle and Nathan Ronan were not threatened or in imminent risk of serious bodily injury or death at the time they discharged their firearms.
34. Defendants Robert Hinkle and Nathan Ronan were acting under color of state law when they discharged their weapons.
35. Defendants Robert Hinkle and Nathan Ronan's use of lethal force was unreasonable.
36. The Defendants Robert Hinkle and Nathan Ronan's unreasonable use of force caused Quadry Malik Sanders to suffer extreme and severe pain, agony and death.

WHEREFORE, Plaintiff demands judgment in her favor, and against Robert Hinkle and Nathan Ronan, pursuant to 42 U.S.C. § 1983, in an amount in excess of One Million Dollars (\$1,000,000.00), including interest, delay damages, costs of suit, general and specific damages, including both survival and wrongful death damages, punitive and exemplary damages as provided by law, attorneys' fees under U.S.C. 1985 and 1988, and any other remedies legally appropriate.

COUNT VII: DELIBERATE INDIFFERENCE: 42 U.S.C. §1983

Mina Woods v. Police Officer Robert Hinkle and Police Officer Nathan Ronan

37. Plaintiff incorporates all allegations set forth above as if fully set forth herein.
38. Defendants Robert Hinkle and Nathan Ronan had subjective knowledge that Quadry Malik Sanders had a serious medical need when they shot him as he was struggling to breathe.
39. Defendants Robert Hinkle and Nathan Ronan had subjective knowledge that there was a risk of serious harm to Quadry Malik Sanders if medical treatment was delayed.

40. Defendants Robert Hinkle and Nathan Ronan were deliberately indifferent to Quadry Malik Sanders' risk of serious harm as demonstrated by their disregard of that risk and their failure to take appropriate steps to provide Quadry Malik Sanders with adequate care for his very serious medical needs. Instead of attempting to save Quadry Malik Sanders' life, Defendants Robert Hinkle and Nathan Ronan dragged him by his feet, handcuffed him behind his back, physically restrained him in a prone position, and repeatedly yelled at him to "quit moving," and "quit reaching."
41. Defendants Robert Hinkle and Nathan Ronan deliberate indifference to Quadry Malik Sanders' risk of serious harm was objectively unreasonable and was undertaken intentionally, with malice and knowing disregard for Quadry Malik Sanders' clearly established constitutional rights.
42. Plaintiff seeks damages, including for the extent of Quadry Malik Sanders' injuries, pre-death pain and suffering, emotional distress, and loss of life and enjoyment of life, as well as all available damages available under the law.

WHEREFORE, Plaintiff demands judgment in her favor, and against Robert Hinkle and Nathan Ronan, pursuant to 42 U.S.C. § 1983, in an amount in excess of One Million Dollars (\$1,000,000.00), including interest, delay damages, costs of suit, general and specific damages, including both survival and wrongful death damages, punitive and exemplary damages as provided by law, attorneys' fees under U.S.C. 1985 and 1988, and any other remedies legally appropriate.

COUNT II: ASSAULT AND BATTERY

Mina Woods v. Police Officer Robert Hinkle and Police Officer Nathan Ronan

43. Plaintiff incorporates all allegations set forth above as if fully set forth herein.
44. Defendants Robert Hinkle and Nathan Ronan, individually and in unison, intentionally

used lethal force against the body of Quadry Malik Sanders.

45. Defendants Robert Hinkle and Nathan Ronan's use of force against the body of Quadry Malik Sanders occurred without consent or justification.

46. Defendants Robert Hinkle and Nathan Ronan use of force against the body of Quadry Malik Sanders was harmful in that it caused him extreme agony, pain, and death.

WHEREFORE, Plaintiff demands judgment in her favor, and against Defendants Robert Hinkle and Nathan Ronan including interest, delay damages, costs of suit, general and specific damages, including both survival and wrongful death damages, punitive and exemplary damages as provided by law.

COUNT V: RESPONDEAT SUPERIOR 51 Okla. Stat. §151 et seq.,
City of Lawton

47. Plaintiffs incorporate all allegations set forth above as if fully set forth herein.

48. Defendants Robert Hinkle and Nathan Ronan engaged in a course of conduct that constitutes the tort of Assault and Battery.

49. Defendants Robert Hinkle and Nathan Ronan's course of tortious conduct was the cause of extreme agony, pain, and death.

50. Defendants Robert Hinkle and Nathan Ronan's course of tortious conduct was within the course and scope of their employment with the City of Lawton.

51. Defendant City of Lawton is liable for the tortious conduct of Defendants Robert Hinkle and Nathan Ronan under the doctrine of Respondeat Superior.

WHEREFORE, Plaintiff demands judgment in her favor, and against Defendants Robert Hinkle and Nathan Ronan including interest, delay damages, costs of suit, general and specific damages, including both survival and wrongful death damages, punitive and exemplary damages as provided by law.

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Pro hac vice petition forthcoming