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**COMMONWEALTH OF KENTUCKY
SCOTT COUNTY CIRCUIT COURT
CIVIL ACTION NO: 26-CI-
ELECTRONICALLY FILED**

**SAMANTHA EDDINGTON, Individually,
and As Natural Parent and Next Friend of K.E.,
a minor,**

And

**TOSHA WILLIAMSON, Individually, and as
Natural Parent and Next Friend of T.C., a minor**

PLAINTIFFS,

V.

**SCOTT COUNTY BOARD OF EDUCATION,
Service Via Scott County Sheriff
c/o Diana Brooker, Board Chair
2168 Frankfort Road
Georgetown, KY 40324**

**BILLY PARKER, SUPERINTENDENT,
INDIVIDUALLY, and in his Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

**BRENT ALLEN, ASSISTANT SUPERINTENDENT,
INDIVIDUALLY, and in his Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

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**ELIZABETH GABEHART, PRINCIPAL,
INDIVIDUALLY , and in her Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

**RENEA KENNEDY, ASSISTANT PRINCIPAL,
INDIVIDUALLY , and in her Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

**RANDY MAYNARD, ASSISTANT PRINCIPAL,
INDIVIDUALLY , and in her Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

**ARTIE TRENT, ASSISTANT PRINCIPAL,
INDIVIDUALLY , and in her Official Capacity as an
EMPLOYEE/AGENT of SCOTT COUNTY
BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

**SEAN WOODS, INDIVIDUALLY, and in his
Official Capacity as an EMPLOYEE/AGENT of
SCOTT COUNTY BOARD OF EDUCATION,
Service Via Scott County Sheriff
Scott County School District
2168 Frankfort Road
Georgetown, KY 40324**

And

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**JOHN AND JANE DOE, KNOWN AND UNKNOWN
 EMPLOYEES/AGENTS of the SCOTT COUNTY
 BOARD OF EDUCATION,
 Service Via Scott County Sheriff
 Scott County School District
 2168 Frankfort Road
 Georgetown, KY 40324**

DEFENDANTS.

COMPLAINT

COME NOW, the Plaintiffs, Samantha Eddington, individually, and as next friend of K.E., a minor, and Tosha Williamson, individually, and as next friend of T.C., a minor, by and through the undersigned counsel and for their cause of action against the Defendants, Scott County Board of Education, Billy Parker, individually, and in his official capacity as Superintendent, Elizabeth Gabehart, individually, and in her official capacity as Principal, Renea Kennedy, individually and in her official capacity as Assistant Principal, Randy Maynard, individually, and in his official capacity as Assistant Principal, Artie Trent, individually, and in his official capacity as Assistant Principal, and Sean Woods, individually, and in his official capacity as an Employee/Agent of the Scott County Board of Education, and John and Jane Doe, Unknown Employees/Agents of the Scott County Board of Education, state as follows:

1. The Plaintiff, Samantha Eddington, is a resident of Scott County, Kentucky, and her mailing address is 148 Camp Creek Way, Georgetown, KY 40324. Samantha Eddington is the natural mother of the minor child, K.E.
2. The Plaintiff, Tosha Williamson, is a resident of Scott County, Kentucky and her mailing address is 111 Sequoia Bend Court, Georgetown, KY 40324. Tosha Williamson is the natural mother of the minor child, T.C.
3. Additionally, the Plaintiffs are under no disability.

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4. Defendant, Scott County Board of Education, (hereinafter "SCBOE") with a physical and mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324, was and is a Kentucky public school system operating in Scott County, Kentucky, operating and maintaining SCHS (hereinafter "SCHS"), a public education high school, located at 2168 Frankfort Road, Georgetown, Kentucky 40324. Diana Brooker is a current board member of the Scott County Board of Education.
5. Defendant, Billy Parker, Superintendent, Individually and in his official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.
6. Defendant, Brent Allen, Assistant Superintendent, Individually and in his official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.
7. Defendant, Elizabeth Gabehart, Principal of SCHS, individually and in her official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including

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K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.

8. Defendant, Renea Kennedy, Assistant Principal of SCHS, individually and in her official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.
9. Defendant, Randy Maynard, Assistant Principal of SCHS, individually and in his official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.
10. Defendant, Artie Trent, Assistant Principal of SCHS, individually and in his official capacity as an employee of the Scott County Board of Education, is an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.
11. Defendant, Sean Woods, individually and in his official capacity as an employee of the Scott County Board of Education, was an employee or agent of the Scott County Board of Education with responsibility for ensuring the health, welfare, and safety of students at

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all Scott County schools, including SCHS, including K.E. and T.C. at all times relevant and has a mailing address of 2168 Frankfort Road, Georgetown, Kentucky 40324.

12. Defendants John and Jane Doe, Known and Unknown Employees/Agents of the Scott County Board of Education, individually, and in their official capacity as Employees/Agents of the Scott County Board of Education with responsibility for hiring and supervising other Scott County Board of Education Employees and Agents and for ensuring the health, welfare, and safety of students at all Scott County, Schools, including K.E. and T.C. at all times relevant.
13. That all events complained of herein occurred in Scott County, Kentucky.
14. That the Scott Circuit Court has personal jurisdiction over all parties to this action and is the proper venue for this action.
15. That the Scott Circuit Court has subject matter jurisdiction over this action.
16. That K.E., a minor, is a resident of Scott County, Kentucky, who is an amputee, having lost one of her legs, and attended SCHS at the time of the complained-of incidents.
17. That T.C., a minor, is a resident of Scott County, Kentucky and attended SCHS at the time of the complained-of incidents.
18. At all relevant times, K.E. and T.C. were enrolled as students at SCHS, a Scott County Public School.
19. All of the Defendants herein, known or unknown, individually and in their official capacities as agents and employees of the Scott County Board of Education, owed K.E. and T.C. a duty to supervise them and ensure their general health, safety, and welfare while they attended SCHS, a Scott County School.

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20. Defendants SCBOE, Parker, Allen, Gabehart, Kennedy, Maynard, Trent, and Doe (hereinafter known as “Supervisory Defendants”), individually and in their official capacities as agents and employees of the Scott County Board of Education, owed K.E. and T.C. a duty of care with respect to hiring and supervising other Scott County Board of Education Employees and Agents.
21. Beginning on or about August 1, 2025 and continuing through the present, all of the Defendants herein, known or unknown, individually and in their official capacities as agents and employees of the Scott County Board of Education so negligently and carelessly supervised K.E. and T.C. while they were attending SCHS such that they caused or allowed K.E. and T.C. to be subjected to assault, battery, sexual abuse, and mental and/or emotional injuries.
22. Upon information and belief, all Supervisory Defendants knowingly developed and maintained staffing levels at the school without regard or student need levels or the minimum time necessary to perform the essential functions of keeping students safe, including K.E. and T.C.
23. Upon information and belief, Supervisory Defendants knowingly failed to provide appropriate training to SCBOE staff regarding appropriate supervision and care for students, including students with disabilities.
24. The actions, or failures to act, of all the Defendants herein, known or unknown, individually and in their official capacities as agents and employees of the Scott County Schools, constitute a breach of their aforementioned duties to K.E. and T.C., and give rise to the statutory and common law tort claims by Plaintiff of negligence, assault, battery,

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intentional infliction of emotional distress, negligent infliction of emotional distress, sexual abuse, sexual assault, and outrageous conduct.

FACTS

25. Plaintiffs incorporate the preceding allegations as if fully stated herein.
26. At all times relevant herein, Scott County High School was a high school located at 1051 McClelland Circle, Georgetown, KY 40324, operated by the Scott County Board of Education.
27. The Scott County Board of Education has general control and management of Scott County schools pursuant to KRS 160.290 and other applicable laws. As a Scott County school, Scott County High School is owned and/or operated by the Scott County Board of Education.
28. All conduct complained of herein occurred in Scott County, Kentucky.
29. At all times relevant herein, K.E. and T.C. were enrolled in and attended Scott County High School. They were under the age of 18.
30. At all times relevant herein, K.E. and T.C. were minors and residents of Scott County, Kentucky.
31. At all times relevant herein, security cameras were located throughout the subject school building.
32. At all times relevant herein, Defendants Woods and Doe were employed by Scott County Schools.
33. At all times relevant herein, Defendant Billy Parker was employed as the Superintendent of Scott County Schools.

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34. At all times relevant herein, Defendant Brent Allen was employed as the Assistant Superintendent of Scott County Schools.
35. At all times relevant herein, Defendant Elizabeth Gabehart was employed as the Principal of Scott County High School.
36. At all times relevant herein, Defendant Renea Kenndy was employed as an Assistant Principal of Scott County High School.
37. At all times relevant herein, Defendant Randy Maynard was employed as an Assistant Principal of Scott County High School.
38. At all times relevant herein, Defendant Artie Trent was employed as an Assistant Principal of Scott County High School.
39. At the time that the alleged incidents of abuse occurred, Defendant Woods was employed as a basketball coach and JAG (Jobs for America's Graduates) teacher at Scott County High School. Both K.E. and T.C. were students in his JAG class.
40. Throughout the semester, Defendant Woods made numerous inappropriate comments and gestures to the girls, including touching them.
- a. T.C. attempted to show Defendant Woods a photograph of her dinner on her phone and Defendant Woods told her to "show [him] something good."
 - b. Defendant Woods made these statements to T.C. at his desk, out of earshot of the other students in the room, facing toward the wall so that "no one could read [their] lips."
 - c. Defendant Woods would frequently touch K.E. and T.C. on their hips or shoulders, or brush their hair back so that he could whisper in their ears.

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- d. Defendant Woods would make K.E. and T.C. pull their chairs up to his desk to sit close to him.
- e. Defendant Woods asked K.E. and T.C. to be “managers” on the basketball team so that he could spend additional time with them.
- f. Defendant Woods would encourage K.E. and T.C. to skip their other classes and would allow them to order food to his classroom so that they did not leave the room for long periods of time.
41. On November 10, 2025, Defendant Woods was in his classroom with JAG students, including T.C.
- a. While Defendant Woods had exhibited inappropriate behavior with K.E. and T.C. previously, his behavior escalated on this date, due to T.C. being alone in his classroom.
- b. Defendant Woods asked T.C. if she “had ever orgasmed” or if they “ever played with” themselves. He also told T.C. that she “should have dropped by” his classroom and that “us old people do it good.”
- c. Defendant Woods asked T.C. about her own sexual experiences, whether or not she was having sex.
- d. Defendant Woods asked T.C. about her plans outside of school and offer to come to parties with her and drink alcohol with her.
42. On November 18, 2025, K.E. and T.C. reported Defendant Woods’ conduct to the Guidance Counselor, Cody McCann, at lunch.
- a. Following T.C.’s return home that afternoon and seeing her child’s distress, Plaintiff Tosha Williamson left her home to go to SCHS at 5:00 p.m.

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- b. As of 5:00 p.m., Plaintiffs had not been informed of the report that K.E. and T.C. had made.
- c. At 5:03 p.m., Defendant Gabehart left a voicemail message for Plaintiff Williamson, but did not convey any allegations or relevant information.
- d. Plaintiff Williamson informed Defendant Gabehart that T.C. would not be returning to school the next day and should no longer be in the presence of Defendant Woods.
43. On November 19, 2025, Plaintiffs met with Defendant Allen, Assistant Superintendent of Scott County Schools.
- a. Defendant Woods' JAG class was scheduled to go on a field trip on that day.
- b. K.E. left to join her class on the field trip, believing that Defendant Woods would not be on the field trip, given the allegations made against him.
- c. K.E. soon discovered that Defendant Woods was on the bus with her.
- d. Defendant Gabehart assured Plaintiff Eddington that Defendant Woods would not attend the field trip. This assurance was a lie.
- e. Defendant Woods told K.E. that she "had to go on the field trip" that day because she had been absent from school the previous week.
- f. Defendant Woods repeatedly referred to K.E. as "pretty girl."
- g. While K.E. was on the bus, she called her mother and informed her that Defendant Woods was present on the bus. K.E. told Plaintiff that she was scared and uncomfortable and embarrassed, due to Defendant Woods presence.
- h. Cory McCann overheard Defendant Woods' comments to K.E. on this date and reported those comments to the Plaintiffs.

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- i. Brent Allen interviewed T.C. regarding the allegations that she had reported the previous day. He advised the Plaintiffs that he would be conducting the investigation surrounding the allegations made by K.E. and T.C.
- j. The Plaintiffs suggested numerous time that Defendant Woods be suspended during the investigations so that K.E. and T.C. would be protected and feel safe at school. Plaintiffs suggested even that Defendant Woods continue to receive his salary, pending the results of the investigation. Mr. Allen advised that he could not discuss a personnel disciplinary action.
- k. Mr. Allen asked the Plaintiffs to send him a timeline of the events that K.E. and T.C. complained of, so that he could review video footage.
- l. Mr. Allen stated that K.E. and T.C. needed to list every person they came into contact with throughout the school day in the requested timeline, despite having been told that there were no witnesses to the conversations between Defendant Woods and K.E. and T.C.
- m. Plaintiffs completed such timelines, which included lists of the students in the classroom at the time of the abuse.
- n. Upon information and belief, the students listed as having been in the classroom at the time of the abuse were interviewed by Mr. Allen.
- o. Plaintiffs later left the school, having never spoken to Defendant Gabehart, despite requests to do so.
- p. Plaintiffs contacted the Scott County Attorney, who directed them to contact the Sheriff's Office.

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- q. The Scott County Sheriff's Office directed Plaintiffs to contact the School Resource Officer, Officer David Hodapp, about the situation.
- r. Plaintiffs contacted Officer Hodapp and reported the situation to him.
- s. Upon information and belief, another complaint of sexual harassment had previously been filed by another teacher against Defendant Woods. This teacher was told that "there was not enough" to file a Title IX Report regarding Defendant Woods' conduct.
44. On November 20, 2025, Plaintiffs provided their timeline of events to Mr. Allen and Mrs. McCann.
- a. A social worker with the Department for Community-Based Services contacted Plaintiff Williamson and asked if she could speak to T.C.
- b. This social worker explained that a case had been opened and T.C. would need to be interviewed at the Children's Advocacy Center in Lexington.
- c. T.C. was told by a fellow student that Defendant Woods knew that she had made allegations against him.
- d. Plaintiffs contacted the school to inquire as to Defendant Woods' knowledge and never received a response.
- e. Upon information and belief, Defendant Woods told other students to "stay away from" K.E. and T.C. because they were "trouble."
- f. Upon information and belief, Defendant Woods informed the student athletes on the basketball team, "I know you've hear the bullshit rumors. I don't know why she's lying on me, but that's not what we're focusing on."

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g. K.E. and T.C. received text messages from fellow students about them “ratting” on

Defendant Woods, causing them both significant additional emotional distress.

45. On November 22, 2025, Plaintiff Eddington was contacted by social services and only then discovered that the school did not report K.E. as a victim. Only the allegations made with regard to Defendant Woods’ behavior involving T.C. had been reported. The school had failed to report the allegations of inappropriate behavior with regard to K.E.

46. On November 24, 2025, Brent Allen contacted Plaintiffs and asked them to come to the school.

- a. Plaintiffs met with the Title IX coordinator, Frank Howartt.
- b. Plaintiffs were discouraged from filing Title IX complaints because it would “slow down the process.”
- c. Plaintiffs were informed that a Title IX investigation could not begin for 10 days and that Defendant Woods would have access to all information reported in connection with such investigation.
- d. Plaintiffs, along with K.E. and T.C., were interrogated by Mr. Allen and Mr. Howartt for some time, causing additional emotional distress.
- e. Plaintiffs, again, requested that Defendant Woods be removed from the classroom to ensure safety of K.E. and T.C.
- f. Again, Plaintiffs were told that they could not be informed about personnel disciplinary issues.
- g. Mr. Allen, however, confirmed that he had reviewed the video footage of Defendant Woods’ classroom on November 18, 2025, and that T.C. had been in that classroom for four hours on that date.

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47. On November 25, 2025, Plaintiffs received an email from Title IX coordinator, Frank

Howartt.

- a. This email included documents necessary to file a Title IX report.
- b. At the time that he sent the email, Mr. Howartt called Plaintiffs and asked them to reply in writing and decline the option to file a report.
- c. Plaintiff refused to put such declination in writing.

48. On December 1, 2025, Plaintiffs spoke to Mrs. McCann, who requested that they meet with Defendant Allen that afternoon.

- a. Plaintiffs requested that K.E. and T.C. be allowed to enroll in Scott County Online Learning Academy, due to the failure to remove Defendant Woods from the school.
- b. At 4:00 p.m. that day, Defendant Allen informed that Plaintiffs, K.E., and T.C. that the investigation regarding their allegations had been completed and that the allegations had been unsubstantiated.
- c. Defendant Allen stated that there were no witnesses that corroborated K.E. and T.C.'s allegations. Plaintiffs reminded Defendant Allen that they had told him there were no other witnesses to the abuse.
- d. Defendant Allen stated that T.C. had been speaking with Defendant Woods about a "pregnancy scare," which was untrue.
- e. Defendant Allen implied that any inappropriate interactions between K.E. and T.C. and Defendant Woods were a result of this fictitious "pregnancy scare" conversation.
- f. Following this meeting, Plaintiffs sent emails to the administration with additional information which K.E. and T.C. were not comfortable giving in person.

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49. On December 4, 2025, K.E. and T.C. returned to Scott County High School.
- a. Plaintiff Williamson spoke to a detective from Scott County Sheriff's Department who stated that T.C. was the only child who made allegations against Defendant Woods.
 - b. Defendant Parker sent a text message to Plaintiffs stating that "after a thorough investigation, not one single witness provided any information to suggest [T.C.'s] claims to be true."
 - c. However, as of this date, Defendant Parker was aware of the complaint of inappropriate comments and interactions made by another teacher against Defendant Woods.
 - d. Defendant Parker was concerned only with the reputation of Defendant Woods, stating that "I worry that, because he is such a high profile figure, it may run." He also stated that this entire situation was "not to be shared" and to "please keep this to yourselves."
50. On December 11, 2025, Plaintiff Williamson made a post on social media regarding Defendant Woods and the manner in which Scott County High School and its administrators handled the situation.
- a. Numerous parties, including school employees, reached out to Plaintiffs to confirm that Defendant Woods had been reported for inappropriate interactions with other students and teachers on multiple occasions.
 - b. Plaintiffs were informed of an inappropriate personal relationship between Defendant Woods and Defendant Gabehart.

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51. On December 12, 2025, Defendant Parker releases a public statement to the Georgetown News Graphic, stating that only one student had reported, that no witnesses corroborated the claim, and that the claim was found to be unsubstantiated.
- a. Defendant Gabehart stated that she did not know who made the statement, but made no attempt to correct the misinformation contained therein.
52. On December 18, 2025, Plaintiffs spoke at a Scott County Schools Board Meeting about the inappropriate statements of Defendant Woods. Plaintiffs' statements were censored from the public broadcast of the meeting.
53. On December 19, 2025, Defendant Woods went out of his way to follow K.E. and T.C. down a flight of stairs, despite there being two flights closer to his classroom.
54. On December 22, 2025, Plaintiffs received confirmation that Defendant Woods had told the basketball team that he was being investigated and that the allegations were untrue, despite Plaintiffs having been assured that neither Defendant nor any other students had been told about the allegations or the investigation.
- a. The social worker assigned to the case, Anna Stark, informed Plaintiff Eddington that her daughter, K.E. was not listed as a victim in the report made to DCBS.
55. On January 5, 2026, K.E. and T.C. were given a map of SCHS, which limited them from entering certain areas of the school where Defendant Woods would be throughout the day. Such areas included the main stairs and the school gymnasium.
- a. K.E. and T.C. were further told that they would be escorted to the restroom at all times and were not to be in the building past a certain time.
 - b. Plaintiffs were never informed by the school of these new restrictions.

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- c. Being forced to use alternate stairs caused additional physical and mental difficulty for K.E., due to her disability.
 - d. Due to the added strain of having to circumnavigate certain areas of the school, K.E. developed a limp, which remained present for some time.
 - e. K.E. has a 504 plan through Scott County High School. Such plan was not considered when forcing K.E. to circumnavigate the school to avoid Defendant Woods.
 - f. Plaintiffs sent emails to Defendants Allen, Gabehart, and Parker regarding these limitations and were ignored.
 - g. Plaintiffs posted photographs of the map given to K.E. and T.C. on Facebook. Nearly immediately, Plaintiffs were contacted by Mrs. McCann, demanding that the photograph be removed, as maps of the school building were not permitted to be publicly posted for safety reasons. However, a map of the school is posted on Scott County High School's Facebook page.
 - h. Plaintiffs again demanded that Defendant Woods be removed from the classroom and, again, were ignored.
56. Upon information and belief, the Supervisory Defendants and/or Defendant Woods cancelled and/or rescheduled multiple meetings with DCBS regarding K.E. and T.C.'s allegations.
57. On January 12, 2026, K.E. and T.C. transferred from Scott County High School as a direct result of the Supervisory Defendants' failure to remove Defendant Woods from the school.
58. On January 30, 2026, Defendants Gabehart and Woods are photographed together at a pub in Georgetown.

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59. On February 4, 2026, Plaintiffs submitted an Open Records Request to Scott County High School.
60. On February 7, 2026, Defendant Woods coaches the SCHS basketball team at a game, despite the pending investigation and allegations of sexual abuse.
61. On February 20, 2026, Plaintiffs request a meeting with Defendants Parker and Allen. Defendant Allen only agrees to meet with Plaintiff Eddington only. Defendant Allen specifically refuses to meet with Plaintiffs at the same time.
62. On February 26, 2026, Plaintiffs receive a partial response to their Open Records Request.
- a. As of this date, Defendant Woods still has refused to be interviewed by DCBS.
 - b. Defendant Allen admitted that much of the investigation had been mishandled.
 - c. Defendant Gabelhart announces her retirement.
 - d. Plaintiffs appear at a second public Board Meeting and make statements regarding a Kentucky Association of School Administrators (KASA) public statement on Grooming.
63. On February 27, 2026, Defendant Allen tells Plaintiffs that Scott County Schools will be working with KASA to update their policies regarding grooming of students.
64. On March 2, 2026, social workers with DCBS inform Plaintiffs that the allegations against Defendant Woods have been substantiated.
65. On March 3, 2026, Defendant Woods resigns from his employment with Scott County Schools.
66. On March 4, 2026, Plaintiffs are allowed to go to Central Office to view video footage of K.E. and T.C. in Defendant Woods' classroom.

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- a. After watching the footage, Plaintiffs request a meeting with Defendants Allen and Parker, but are told that they are unavailable.
 - b. Plaintiffs went to the Department of Education office in Frankfort, Kentucky and are advised to file an official report of their complaints. Such report is filed.
 - c. Plaintiffs return to the Scott County Schools Central Office and, again, request to meet with Defendants Allen and Parker.
 - d. Defendant Allen states that he is confident in the investigation that was completed by SCHS and that he had made all required reports.
 - e. Plaintiffs again request to meet with Defendant Parker and are told he is unavailable.
 - f. Plaintiffs receive an email the following day that Defendant Parker is no longer their “point of contact.”
67. On March 5, 2026, Plaintiffs confirm that DCBS has informed Scott County Schools of the results of their investigation.
68. On March 13, 2026, Plaintiffs receive the remainder of the documents responsive to their Open Records Request.
69. On March 26, 2026, Plaintiffs attend a third public board meeting and make statements. Scott County Board members can be observed mocking the parents in attendance and praising Defendant Parker following the public comment session.
70. Upon information and belief, when interrogated, other students identified “boundary issues” exhibited by Defendant Woods, along with sexual comments or gestures present in his classroom.

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71. Upon information and belief, numerous reports had been filed regarding Defendant Woods making sexual comments, gestures, or advances against other staff members or students, of which the Supervisory Defendants were aware.
72. Upon information and belief, Defendant Woods had been terminated from prior employment as a result of the sexual comments, gestures, or advances that he had made against other staff members or students, of which the Supervisory Defendants were aware.
73. Upon information and belief, Defendant Woods is named as a defendant in a civil suit filed against him by former fellow staff members or former students, of which the Supervisory Defendants were aware at the time of his hiring.
74. The Supervisory Defendants were aware of Defendant's propensity for and history of inappropriate conduct and still failed to protect K.E. and T.C., even after these acts were reported and investigated.

COUNT I- NEGLIGENCE

75. Plaintiffs incorporate the preceding allegations as if fully stated herein.
76. Defendants Woods and Doe had a duty to competently and safely perform their jobs in such a manner as to ensure student safety.
77. Upon information and belief, Defendants Woods and Doe breached this duty when they unlawfully forcefully contacted K.E. and T.C., subjecting them to such conduct which caused him to suffer physical, mental, and emotional injuries.
78. Upon information and belief, Defendants Woods and Doe breached this duty when they failed to intervene to prevent harm to K.E. and T.C.
79. Upon information and belief, the negligence of Defendants Woods and Doe directly and proximately caused K.E. and T.C. to suffer physical, mental, and emotional injuries.

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80. Defendant Woods and Doe were grossly negligent by acting with wanton or reckless disregard for the lives, safety, or property of K.E. and T.C.

COUNT II- ASSAULT

81. Plaintiffs incorporate the preceding allegations as if fully stated herein.
82. At the time of the incident(s) giving rise to this action, Defendants Woods and Doe did unlawfully and intentionally assault K.E. and T.C., causing physical, mental, and emotional injuries.
83. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT III- BATTERY

84. Plaintiffs incorporate the preceding allegations as if fully stated herein.
85. At the time of the incident(s) giving rise to this action, Defendants Woods and Doe did unlawfully and maliciously forcefully contact K.E. and T.C., causing physical, mental, and emotional injuries.
86. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary

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and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial. MEDIA5022

COUNT IV- SEXUAL ASSAULT

87. Plaintiffs incorporate the preceding allegations as if fully stated herein.
88. At the time of the incident(s) giving rise to this action, Defendants Woods and Doe did unlawfully and intentionally sexually assault K.E. and T.C. when he made inappropriate comments of a sexual nature to them and touched them in a sexual manner, causing physical, mental, and emotional injuries.
89. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT V- INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

90. Plaintiffs incorporate the preceding allegations as if fully stated herein.
91. Defendants Woods and Doe acted intentionally and/or recklessly when he forcefully contacted, assaulted, and sexually assaulted K.E. and T.C.
92. The actions taken by Defendants Woods and Doe clearly offend the accepted standards of decency and morality.
93. Defendants Woods and Doe caused K.E., Samantha Eddington, T.C., and Tosha Williams to suffer severe emotional distress.

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94. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT VI- NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

95. Plaintiffs incorporate the preceding allegations as if fully stated herein.
96. Defendants Woods and Doe had a duty to competently and safely perform their job in such a manner as to ensure student safety.
97. Defendants Woods and Doe breached this duty when they unlawfully contacted, assaulted, and sexually assaulted K.E. and T.C.
98. The Defendants breached this duty when they failed to intervene to prevent Defendants Woods and Doe from performing these actions.
99. The negligence of the Defendants directly and proximately caused K.E. and T.C. to suffer serious physical, mental, and emotional injuries.
100. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

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COUNT VII- FAILURE TO REPORT

101. Plaintiffs incorporate the preceding allegations as if fully stated herein.
102. The Defendants had a duty to immediately report neglect or abuse to a local law enforcement agency, the Department of Kentucky State Police, the Cabinet, the Commonwealth's attorney, or the County attorney under KRS 620.030.
103. Upon information and belief, the Defendants failed to report such neglect or abuse, unreasonably delayed reporting, and failed to fully report the neglect or abuse of which they reasonably had knowledge.
104. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT VIII- ACTIVE CONCEALMENT

105. Plaintiffs incorporate the preceding allegations as if fully stated herein.
106. The Defendants had a duty not to conceal the facts reported to them or made known to them, but rather to report them immediately to the authorities designated by KRS 620.030.
107. Further, "[s]chool personnel or other persons listed in KRS 620.030(2) do not have the authority to conduct internal investigations in lieu of the official investigations outlined in this section." KRS 620.040(4).
108. The Defendants failed to report the facts presented to them and, instead, conducted an internal investigation, actively concealing the abuse and neglect of K.E. and T.C.

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109. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT IX- FAILURE TO FOLLOW DISTRICT POLICY

110. Plaintiffs incorporate the preceding allegations as if fully stated herein.

111. Under Scott County District policy, the Defendants had a duty to immediately report neglect or abuse to a local law enforcement agency, the Department of Kentucky State Police, the Cabinet, the Commonwealth's attorney, or the County attorney. Scott County School District Policy 09.227.

112. Following a report, such policy dictates that the reporting employee "shall then immediately notify the Principal of the suspected abuse." *Id.*

113. Furthermore, [a]ny person who knowingly causes intimidation, retaliation, or obstruction in the investigation of the report shall be guilty of a Class A misdemeanor." *Id.*

114. Upon information and belief, the Defendants failed to report such neglect or abuse, unreasonably delayed reporting, failed to fully report the neglect or abuse, and retaliated against K.E. and T.C. following their reports.

115. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary

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and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT X- VICARIOUS LIABILITY

116. Plaintiffs incorporate the preceding allegations as if fully stated herein.
117. Under common law, a principal is vicariously liable for damages caused by torts of commission or omission of an employee or agent acting on behalf of and pursuant to the agency of the principal.
118. Such liability reasonably extends to other supervisors including, but not limited to, superintendents and assistant principals.
119. Defendants Woods and Doe committed torts against K.E. and T.C. while acting on behalf of and pursuant to the agency of the Supervisory Defendants.
120. As such, the Supervisory Defendants are vicariously liable for the torts of Defendants Woods and Doe.
121. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XI- RESPONDEAT SUPERIOR

122. Plaintiffs incorporate the preceding allegations as if fully stated herein.
123. The Supervisory Defendants are liable for the commissions and omissions of Defendants Woods and Doe under the doctrine of *respondeat superior*.

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124. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XII- NEGLIGENT HIRING, TRAINING, AND RETENTION

125. Plaintiffs incorporate the preceding allegations as if fully stated herein.

126. Plaintiffs' injuries, as well as the injuries sustained by K.E. and T.C., were directly and proximately caused by the Supervisory Defendants' negligent hiring of Defendant Woods, as they knew or should have known about the prior acts and firing of Defendant Woods.

127. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XIII- NEGLIGENT RETENTION

128. Plaintiffs incorporate the preceding allegations as if fully stated herein.

129. Plaintiffs' injuries, as well as the injuries sustained by K.E. and T.C., were directly and proximately caused by the Supervisory Defendants' negligent retention of Defendant Wood, as they knew or should have known about the prior acts, prior firing, and the conduct of Defendant Woods while employed by Scott County Schools.

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130. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XIV- NEGLIGENT SUPERVISION

131. The foregoing incidents occurred because neither K.E., T.C., nor Defendants Woods or Doe were being adequately supervised.

132. Pursuant to common law and/or statute and/or written or unwritten policies, regulations, and/or rules, the Supervisory Defendants herein had a ministerial duty to adequately supervise:

- a. Students in their care, including K.E. and T.C., and
- b. Employees and/or agents within their schools, including Defendants Woods and Doe.

133. The conduct of the Supervisory Defendants was ministerial in nature, and/or was taken in bad faith and/or was outside of the scope of their respective employment or authority, and/or violated Plaintiff's constitutional, statutory, or other well-established rights (which include, but are not limited to, rights contained in policies or procedures and/or case law and/or Kentucky Administrative Regulations), and/or is otherwise conduct for which the Supervisory Defendants are not entitled to immunity.

134. The Supervisory Defendants negligently and inadequately supervised K.E. and T.C., thus breaching their ministerial duty.

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135. The Supervisory Defendants had a duty to reasonably supervise K.E. and T.C. while they were at school to prevent them from being sexually assaulted and to otherwise avoid and minimize injury to K.E. and T.C., and that the Supervisory Defendants breached this duty.
136. The Supervisory Defendants had a duty to reasonably supervise Defendants Woods and Doe while they were at school to prevent them from being assaulted (sexually or otherwise) other students, and the Supervisory Defendants breached this duty, causing harm and damages to K.E. and T.C.
137. In Kentucky, a “special relationship” is formed between the school district and its students whereby “the protective custody of teachers is mandatorily substituted for that of the parent.” *Williams, et al. v. Kentucky Department of Education, et al.*, 113 S.W.3d 145, 148 (Ky. 2003).
138. Persons standing in a special relationship with others in their charge may be held liable for failure to protect them from harm. *Lane v. Commonwealth*, 956 S.W.2d 874 (Ky. 1997).
139. Defendants had a special relationship with K.E. and T.C. pursuant to the foregoing cases and their progeny.
140. Defendants’ special relationship with K.E. and T.C., particularly when coupled with their knowledge that Defendant Woods had a history of sexually or otherwise assaulting other students, required them to take all reasonable steps to protect K.E. and T.C. from harm, ensure their safety, and otherwise prevent them from needlessly being injured and/or sexually assaulted by employees of the school.
141. The Defendants herein failed to take reasonable steps to protect K.E. and T.C., and took no action to prevent K.E. and T.C.’s injuries and damages.

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142. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XV- NEGLIGENCE PER SE

143. The Defendants further had a common law duty to K.E. and T.C., requiring them to exercise reasonable care to ensure their safety while at Scott County High School.

144. The Defendants' acts or omissions described herein above breached their duty to exercise reasonable care to ensure K.E. and T.C.'s safety at Scott County High School.

145. Each Defendant was negligent for failing to exercise due care for K.E. and T.C.'s safety.

146. Each Defendant was negligent in failing to provide supervision reasonably necessary to safeguard K.E. and T.C.

147. The Defendants' failure to appropriately supervise K.E. and T.C. constituted a violation of Kentucky law, including, but not limited to, law regarding the general supervision of the general conduct of the schools pursuant to KRS 160.370 and law requiring the implementation and enforcement of student discipline guidelines pursuant to KRS 158.148 *et seq.*, and Defendants are therefore negligent per se.

148. The Defendants' negligence per se caused K.E. and T.C. to endure and will continue to endure, in the future, extensive mental and physical pain and suffering and medical expenses all in an amount sufficient to invoke the jurisdiction of this Court.

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149. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XVI- VIOLATION OF THE KENTUCKY CIVIL RIGHTS ACT- DISABILITY

150. Plaintiffs incorporate the preceding allegations as if fully stated herein.

151. Kentucky's Civil Rights Act, KRS § 344, *et seq.*, prohibits discrimination due to one's disability.

152. The Defendants acted in concert to deny K.E. her right to be free from harassment, bullying, assault, and sexual assault, due to her disability.

153. The Defendants' conduct violated KRS §344.020 in failing to properly protect its students from harassment, bullying, assault, and sexual assault.

154. The Defendants' conduct violated KRS §344.020 in failing to properly, timely, and adequately investigate claims of harassment, bullying, and assault, and thereby implicitly condoned harassment, bullying, assault, and sexual assault.

155. As a result of the injuries sustained by K.E., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

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COUNT XVII- VIOLATION OF THE KENTUCKY CIVIL RIGHTS ACT- GENDER

156. Plaintiffs incorporate the preceding allegations as if fully stated herein.

157. Kentucky's Civil Rights Act, KRS § 344, *et seq.*, prohibits discrimination due to one's gender.

158. The Defendants acted in concert to deny K.E. and T.C. their rights to be free from harassment, bullying, assault, and sexual assault, due to their gender.

159. The Defendants' conduct violated KRS §344.020 in failing to properly protect its students from harassment, bullying, assault, and sexual assault.

160. The Defendants' conduct violated KRS §344.020 in failing to properly, timely, and adequately investigate claims of harassment, bullying, and assault, and thereby implicitly condoned harassment, bullying, assault, and sexual assault.

161. As a result of the injuries sustained by K.E. and T.C., Plaintiffs are entitled to compensation in excess of the jurisdictional limit of this Court for damages including, but not limited to, medical expenses (past, present, and future), bodily injuries, both temporary and permanent, physical impairment, pain and suffering, mental anguish, both temporary and permanent, annoyance and inconvenience, disability, educational expenses, punitive and all other damages to be proven at trial.

COUNT XVIII- DAMAGES

162. Plaintiffs incorporate the preceding allegations as if fully stated herein.

163. The conduct of the Defendants as described above was intentional, malicious, and occurred in wanton and reckless disregard of, and with deliberate indifference to the rights of the Plaintiffs, thus entitling Plaintiffs to an award of punitive damages in an amount of be determined by the trier of fact.

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164. As a direct and proximate result of the negligence, recklessness, intentional conduct and otherwise of all Defendants set out above, K.E. and T.C. suffered injuries including, but not limited to, those listed herein. As a result, K.E. and T.C. incurred significant medical expenses (past, present, and future), bodily injuries, physical impairment, pain and suffering, mental anguish, emotional distress, embarrassment, annoyance and inconvenience, disability, educational expenses, and all of the damages to be proven at trial.

165. Plaintiffs seek punitive and compensatory damages against all Defendants in an amount to be determined by the jury to be right and just at the trial of this matter, plus costs and all other relief to which Plaintiffs are entitled by law. Plaintiffs further seek pre- and post-judgment interest at the maximum legal rate until such judgment may be satisfied.

166. K.E. and T.C.'s injuries, both mental and physical, caused severe and serious emotional distress, requiring significant treatment. The injuries diminished K.E. and T.C.'s power to work and earn money, all to their detriment, in an amount in excess of the minimal jurisdictional requirements for the Circuit Courts of the Commonwealth of Kentucky.

167. As a further result of K.E. and T.C.'s injuries, Plaintiffs have been and will be compelled to expend money for reasonably necessary medical and educational expenses and for money expended and to be expended on those accounts. Plaintiffs, therefore, have been and will further be damages in an amount in excess of the minimum jurisdictional requirements for the Circuit Courts of the Commonwealth of Kentucky.

168. As a direct and proximate result of the aforementioned negligent, reckless, and/or grossly negligent conduct of all the Defendants, both jointly and severally, Plaintiffs have suffered a loss of consortium, love, and affection of their minor children, K.E. and T.C.

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WHEREFORE, Plaintiffs pray for a judgment against the Defendants herein, known or unknown, individually and in their official capacities as employees/agents of Scott County Schools, in an amount that will fairly and reasonable compensate Plaintiffs for K.E. and T.C.'s injuries, disability, pain and suffering, medical expenses, educational expenses, lost wages, loss of earning capacity and future earnings and for all other damages sustained as a direct and proximate result of the Defendants' actions or failures to act and in an amount in excess of the jurisdictional minimum of this Court; for their costs expended herein, including a reasonable fee for their attorney, for pre- and post-judgment interest at the maximum legal rate until such judgment may be satisfied, for a trial by jury, for leave to amend their complaint as proof develops, and for any and all other relief to which they may appear entitled.

RESPECTFULLY SUBMITTED

/s/ TRACY D. FRYE
 HON. TRACY D. FRYE
 HON. MARIE E. TROXLER
 HON. WHITNEY N. DAVIS
FRYE, TROXLER & DAVIS, PSC
 400 FERRY STREET * P.O. BOX 411
 RUSSELL, KY 41169
 (606) 833-8400
tracydfrye@me.com
marietroxler@fryelawpsc.com
whitneydavis@fryelawpsc.com

Presiding Judge: HON. KATHRYN GABHART (614428)

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