

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

- 1. **JASON R. DOLLARHIDE,** )
- 2. **HEATHER DOLLARHIDE,** )
- 3. **JASON R. DOLLARHIDE,** as Parent and )  
Next Friend of M.C.D., a Minor Child. )

Plaintiffs, )

Case: 5:22-cv-642-PRW

v. )

- 1. **STATE OF OKLAHOMA ex rel.** )  
**OKLAHOMA DEPARTMENT OF** )  
**PUBLIC SAFETY,** )
- 2. **TROOPER DENNIS DICKENS,** )

Defendants. )

**PLAINTIFF’S SURREPLY  
TO DEFENDANT DENNIS DICKENS AND  
THE OKLAHOMA DEPARTMENT SAFETY, ET AL.  
MOTIONS TO DISMISS THE CASE IN ITS ENTIRETY**

This case was initially filed by Jason Dollarhide, pro se. The case is a 42 U.S. Code § 1983 - Civil action for deprivation of rights by Defendants Dennis Dickens and the Oklahoma Department of Public Safety. According to available documents and the recitation of facts in the original complaint and the subject first amended complaint, the actions of Dennis Dickens, as alleged, were in his capacity as a law enforcement officer commissioned by the Oklahoma Department of Safety and the alleged statement of facts were under the color of law.

The case was timely filed within the applicable limitations of action. The Motions to dismiss without prejudice are procedural and not a final determination of facts as

alleged by the Plaintiffs.

The Plaintiff will prepare and file their first amended complaint against the Defendants, Dennis Dickens and the Oklahoma Department of Safety only.

**WHEREFORE**, Plaintiffs request the Court to deny the Motions to dismiss and allow for this case to proceed on its merits.

Dated this 11th day of June, 2024.

Respectfully submitted,

*/s/ James A. Conrady*

James A. Conrady, OBA #1853  
**CONRADY LAW, PLLC**  
2203 South Western Road  
Stillwater, OK 74074  
Telephone (832) 330-5620  
[Jconrady@hotmail.com](mailto:Jconrady@hotmail.com)  
**ATTORNEY for the PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of June, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants.

*/s/ James A. Conrady*

---