IN AND BEFORE THE OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION STATE OF OKLAHOMA

STATE OF OKLAHOMA ex rel. THE OKLAHOMA BOARD OF MEDICAL LICENSURE AND SUPERVISION, Plaintiff, vs.

EUGENE MARK SHUSTERMAN M.D., LICENSE NO. 21493,

Defendant.

FILED

FEB 1 4 2002

OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION

Case No. 01-09-2404

ANSWER

Defendant, Eugene Mark Shusterman, M.D., for Answer to the Complaint of the Oklahoma State Board of Medical Licensure and Supervision, answers and states as follows:

1. Dr. Shusterman admits the jurisdiction of the Board.

2. Dr. Shusterman admits that he holds Oklahoma License No. 21493.

3. Dr. Shusterman admits that from July 1, 2000 through June 30, 2001, he was a fifth year resident in the Plastic Surgery Residency Program at the University of Oklahoma Health Sciences Center in Oklahoma City, Oklahoma.

4. Dr. Shusterman admits paragraph 4, but denies that he failed to meet the performance standards.

5 Dr. Shusterman denies that patient care was jeopardized due to any acts of negligence or his inability to perform required procedures with appropriate skill and knowledge.

6. Dr. Shusterman denies being guilty of unprofessional conduct, engaging in conduct likely to deceive, defraud or harm the public, engaging in gross negligence in the practice of medicine and surgery, or engaging in practices or other behavior which demonstrates and incapacity or incompetence to practice medicine and surgery.

WHEREFORE, having fully answered, Dr. Shusterman requests the Board to conduct a hearing, dismiss this Complaint and to find that it is unfounded in all respects.

Respectfully submitted, COYLE, III, OBA #1981 **COYLE MCCOY & BURTON** 119 N. Robinson, Suite 320 Oklahoma City, Oklahoma 73102 Telephone: (405) 232-1988 (405) 272-9859 Fax: