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

FILED

STATE OF OKLAHOMA	APR 1 1 2013
EX REL. THE OKLAHOMA BOARD OF MEDICAL LICENSURE AND SUPERVISION,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
Plaintiff,] Case No. 12-09-4614
v.]
CATHERINE LOUISE WHITE, M.D.	j
LICENSE NO. 27039,	1
Defendant.]

ANSWER

Comes the Defendant, Catherine Louise White, M.D., ("Dr. White") and for her Answer to the allegations contained in the Complaint states the following:

- 1. The Complaint fails to state grounds for which disciplinary action may be imposed upon Dr. White.
- 2. Regarding the <u>second unnumbered paragraph</u> of the Complaint, Dr. White admits that the allegations contained therein.
- 3. Regarding the <u>third unnumbered paragraph</u> of the Complaint, Dr. White admits the allegation contained therein.
- 4. With regard to <u>Paragraph Number 1</u> of the Complaint, Dr. White admits the allegation contained therein.
- 5. With regard to <u>Paragraph Number 2</u> of the Complaint, Dr. White admits that she received a letter from Bill Johnson, M.D., in June, 2007, regarding her residency status and

further states that Dr. Johnson's letter speaks for itself. Dr. White is without knowledge or information sufficient to admit or deny the remainder of the allegations contained in Paragraph 2 of the Complaint, and demands strict proof thereof.

- 6. With regard to <u>Paragraph Number 3</u> of the Complaint, Dr. White admits the allegation contained therein.
- 7. With regard to <u>Paragraph Number 4</u> of the Complaint, Dr. White admits the allegations contained therein.
- 8. With regard to <u>Paragraph Number 5</u> of the Complaint, Dr. White admits that in May, 2009, she was accepted into the In His Image residency program, and admits that Dr. Mitchell W. Duininck was the director of that residency program; but she denies that Dr. Duininck directly supervised or directly observed her performance in her residency training.
- 9. With regard to <u>Paragraph Number 6</u> of the Complaint, Dr. White admits the allegations contained therein.
- 10. With regard to <u>Paragraph Number 7</u> of the Complaint, Dr. White admits the allegations contained therein.
- 11. With regard to <u>Paragraph Number 8</u> of the Complaint, Dr. White admits that she began work at Newman Memorial Hospital on August 6, 2012. Dr. White states that she has not seen the letter referenced therein and therefore is without knowledge or information sufficient to either admit or deny the remainder of the allegations contained therein, and demands strict proof thereof.
- 12. With regard to <u>Paragraph Number 9</u> of the Complaint, Dr. White admits the allegations contained therein.

- 13. With regard to <u>Paragraph Number 10</u> of the Complaint, Dr. White has not seen the report referenced therein and therefore is without knowledge or information sufficient to either admit or deny the allegations contained therein, and demands strict proof thereof.
- 14. With regard to <u>Paragraph Number 11</u> of the Complaint, Dr. White denies the allegations contained therein. Specifically, Dr. White states that:
 - (i) she is physically able to practice medicine and surgery with reasonable skill and safety, and she is mentally able to practice medicine and surgery with reasonable skill and safety; and
 - (ii) she is not, and has never been, engaged in any practice or other behavior that demonstrates an incapacity or incompetence to practice medicine and surgery.

Wherefore, Dr. White prays that the Complaint be dismissed with prejudice without the taxation of any costs or expenses.

DOERNER, SAUNDERS, DANIEL

By:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the ______ day of April, 2013, a true and correct copy of the above and foregoing instrument was mailed, with proper postage thereon, to:

Scott R. Sullivan, Esq.
Oklahoma State Board of Medical Licensure and Supervision 101 N.E. 51st Street

Oklahoma City, Oklahoma 73105

David J. Hyman