



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

AUG 12 2025

In the office of the
Court Clerk MARILYN WILLIAMS

PIONEER LIBRARY SYSTEM,

Plaintiff,

v.

CITY OF NORMAN; NORMAN
MUNICIPAL AUTHORITY,

Defendants.

Case No. *CJ-2025-1260*

PETITION

Plaintiff Pioneer Library Systems (“PLS” or “Plaintiff”), for its claims and causes of action against Defendants City of Norman (the “City”) and the Norman Municipal Authority (the “Authority,” which together with the City are sometimes collectively referenced to herein as “Defendants”), alleges and states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is an Oklahoma multi-county public library system organized under 65 O.S. § 4-401 *et seq.*
2. The City is a municipality located in Cleveland County, Oklahoma.
3. The Authority is a public trust located in Cleveland County, Oklahoma.
4. Accordingly, this Court has jurisdiction and venue in this Court is proper pursuant to 12 O.S. § 134.

FACTUAL BACKGROUND

5. Since 1962, the City has agreed to provide PLS with buildings in which PLS provides library services to the community in return.
6. In 2016, PLS and the City entered into a Memorandum of Understanding, where the City acknowledged its intent to construct a new building located at Acres Street to house a new