

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF
HINDS COUNTY, MISSISSIPPI

MARTHA AINSWORTH

PLAINTIFF

VS.

FILED
JUL 18 2008
BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

CIVIL ACTION NO. 2010-567CIV

PATRICIA GILDEA, RAY GILDEA & TRUDY GILDEA

DEFENDANTS

COMPLAINT

COMES NOW the Plaintiff, Martha Ainsworth, by and through the undersigned counsel of records and files this her Complaint against the Defendants, Patricia Gildea, Ray Gildea, and Trudy Gildea, and in support thereof would show unto the Court the following facts and matters to-wit:

1.

The Plaintiff is an actual adult bona fide resident citizen of Rankin County, Mississippi and has been for more than six months next preceding the commencement of this action .

2.

The Defendant, Patricia Gildea, is an actual adult bona fide resident citizen of New Jersey and may be served with process at her residential address of 39 Cranbury Neck Road, Cranbury, New Jersey.

3.

The Defendants Ray Gildea and Trudy Gildea are actual bona fide resident citizens of Mississippi and may be served with process at their residential address at 220 3rd Street South, Columbus, Mississippi.

4.

This Court has jurisdiction over both the parties and the subject matter contained herein.

EXHIBIT
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5.

On June 14, 1974, Martha Ainsworth and Victor McLendon were lawfully married and lived and cohabitated together happily as husband and wife until the wrongful actions of the Defendants which irreparably injured said relationship.

6.

Plaintiff would show that the Defendants did intentionally and/or negligently injure the Plaintiff and deprive her of her spouse and his love, aid, support, protection, comfort, society, companionship, devotion, association, and conjugal affection, and did willfully, wrongfully, and maliciously prejudice his mind against the Plaintiff and did alienate his affections from the Plaintiff.

7.

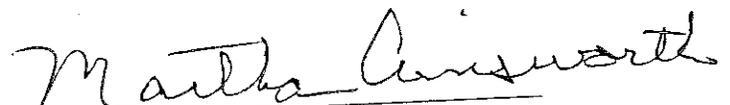
The Defendants' actions took place in Madison County, Mississippi, Adams County, Mississippi, Harrison County, Mississippi, Hinds County, Mississippi, Lowndes County, Mississippi and other places unknown to the Plaintiff.

8.

The Plaintiff did not become aware of the complete depth of the relationship between Patricia Gildea and Victor McLendon or about Defendants, Ray Gildea and Trudy Gildea's facilitation of the relationship, until on or about September 23, 2005. The Defendant, Patricia Gildea, has continued to maintain a relationship with Victor McClendon even while being married to another man.

9.

The Defendants' acts interfered so severely into the marriage of the Plaintiff and her


MARTHA AINSWORTH


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