

THE COCHRAN FIRM

MISSISSIPPI DELTA

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June 10, 2019

Via Certified Mail

City of Oxford
Attn.: Ashley Atkinson, City Clerk
107 Courthouse Square
Oxford, MS 38655

Interim Police Chief Jeff McCutchen
715 Molly Barr Road
Oxford, MS 38655

RE: Betsy Clayton, Individually, and on behalf of the Heirs-At-Law and Wrongful Death Beneficiaries of Dominique Clayton, and the Estate of Dominique Clayton – Notice of Claim
Date of Injury: 05/19/2019

To Whom It May Concern:

Please be advised that The Cochran Firm – MS Delta has been retained to represent Betsy Clayton, Individually, and on behalf of the Heirs-At-Law and Wrongful Death Beneficiaries of Dominique Clayton, and the Estate of Dominique Clayton in their wrongful death and negligence claims against the City of Oxford and Officer Matthew Kinne for injuries Ms. Clayton sustained on or about 05/19/19, resulting in her untimely death. At approximately 1:45am, while Ms. Dominique Clayton was asleep in her home in Oxford, MS, Officer Matthew Kinne entered her home, while on duty and in police uniform, and murdered her for no apparent reason. Ms. Clayton's body was not discovered until approximately 1:00 or 2:00 pm on the afternoon of May 19th, 2019. She was discovered by her 8 year old son, [REDACTED]

Officer Kinne and Ms. Dominique Clayton (now deceased) had been seeing each other for quite a well, prior to her untimely death. Officer Kinne would frequently visit Ms. Clayton's home while on the job and in his uniform. He would arrive at around 1:30am and 2:00am and leave around 4:00am on Wednesday, Thursday, Friday, and Saturday. Prior to her death, Ms. Clayton missed her menstrual cycle and thought she was pregnant by Officer Kinne. Ms. Clayton informed Officer Kinne of the possibility that she was pregnant. On May 14 (a Tuesday), Officer Kinne visited Ms. Clayton's home unexpectedly. Ms. Clayton expressed concerns to her sister that Officer Kinne may cause her harm. Two days later, on May 16, 2019, Officer Kinne forced Ms. Clayton to get rid of her dogs.

Oxford police officers also caused undue stress on Betsy Clayton and other family members by initially stating Dominique Clayton committed suicide although a gun was not found on scene.

As a result of all the aforementioned Defendants' actions, Ms. Clayton expired on 05/19/19. Other claims against said defendants include but are not limited to gross negligence, negligent/intentional infliction of emotional distress, reckless disregard, and negligent/gross negligent supervision, hiring, training, and retention of the officer/individual in question.

Ms. Clayton suffered and her relatives continue to suffer mental and emotional pain and anguish as a result of the aforementioned offenses. Our clients hereby demand an amount in excess of \$5,000,000.00 for compensatory and/or punitive damages. At the time of the injuries, our client Betsy Clayton, was and is currently a resident of Lafayette County, Mississippi.

Please forward this notice of claim to your liability carrier, and have said carrier contact me as soon as possible.

Sincerely,

THE COCHRAN FIRM – MS Delta

Handwritten signature of Carlos E. Moore in cursive script.

Carlos E. Moore, Esq.

CEM/ld

cc: client