

JACKELYN YANONG : DOCKET: 609,429-A
 VERSUS : FIRST JUDICIAL DISTRICT COURT
 JENNY DAWSON COLEMAN , et al. : CADDO PARISH, LOUISIANA

FIRST AMENDED PETITION FOR DAMAGES

The petition of JACKELYN YANONG who is a resident of Shreveport, Caddo Parish, Louisiana, (hereinafter referred to as "petitioner"), respectfully shows:

A.

The petitioner, JACKELYN YANONG, wishes to amend and supplement her original petition for damages. Petitioner realleges and reiterates all paragraphs contained in her original Petition except as follows.

B.

By adding the following to Paragraph one (1) of the original petition:
 Made additional Defendant herein:

"3) AMY SENN, a resident of and domiciled in Caddo Parish, Louisiana, who may be served in open court on November 29, 2018."

C.

By adding the following paragraphs contained in her Original Petition as follows:

"31

Petitioner shows that AMY SENN posted on her "Facebook" the following false and defamatory comments about petitioner:

- 1) That the marriage between petitioner and Danny Lawler is legalized prostitution.
- 2) That she was not purchased through a company but could have worked in a sweatshop.
- 3) That she was bought through a catalogue
- 4) That the plaintiff was purchased through "Loveme.com"

32.

Petitioner further shows that the statements of AMY SENN were made with reckless disregard for the truth.

33.

Petitioner further shows that the allegations are completely false and untrue.

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NOV 28 2018

COLVIN ROBERSON
 CADDO DEPUTY CLERK OF COURT

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34.

Petitioner further shows that the actions described hereinabove of AMY SEEN are designed and intended to cause damage to the petitioner in the following non-exclusive ways:

- a. Defame, libel or slander petitioner;
- b. Invade the privacy of the petitioner;
- c. Intentionally inflict emotional distress and mental anguish on the petitioner.

35.

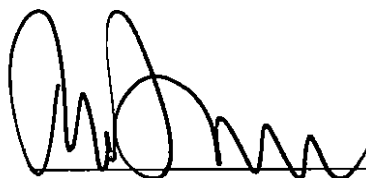
Petitioner further shows that the defendants AMY SENN, GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN are bound in solido for the damages sustained by the petitioner.

36.

Petitioner further shows that their damages, both past, present and future, were caused by the malicious and reckless actions of the defendants, AMY SENN, GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN.

WHEREFORE, PETITIONER PRAYS THAT:

- 1) Defendant, AMY SENN be served in open court on 28th day of November 2018 with the Original Petition and the First Supplemental and Amended Petition for Damages
- 2) After due proceedings had, there be judgment herein in favor of petitioner, **JACKELYN YANONG**, and against the defendants, AMY SENN, GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN in solido, for such sums as the Court may direct or for any award justified under law for the damages sustained by petitioner;
- 3) After due proceedings had, a permanent injunction be issue herein; and
- 4) For all general and equitable relief.



RONALD J. MICIOTTO
Bar No. 07540
628 Stoner Avenue
Shreveport, Louisiana 71101
Tel: (318) 424-0200
Fax: (318) 424-3730
ATTORNEY FOR PETITIONER

PLEASE SERVE:

GEORGE ERIC HATFIELD
10305 Ellerbe Road
Shreveport, Louisiana 71106

and

AMY SEEN
In open Court on 28 November 2018

and

JENNY COLEMAN
*Pursuant to Louisiana Long Arm Statute at
her last known address of:*
223 Cornelson Drive
Greer, South Carolina 29651

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Citation

JACKELYN YANONG
VS
JENNY DAWSON COLEMAN, ET AL

NO. 609429- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: AMY SENN
**PLEASE SERVE IN OPEN COURT
NOVEMBER 29,2018

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within FIFTEEN (15) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date November 28, 2018.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

- REQUEST FOR ADMISSIONS OF FACTS
- INTERROGATORIES
- REQUEST FOR PRODUCTION OF DOCUMENTS
- XX FIRST AMENDED PETITION FOR DAMAGES

By: _____
Deputy Clerk

RON MICIOTTO
Attorney

FILE COPY

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Supplemental Citation

JACKELYN YANONG
VS
JENNY DAWSON COLEMAN, ET AL

NO. 609429 – A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: GEORGE ERIC HATFIELD
 10305 ELLERBE RD
 SHREVEPORT, LA 71106

You are hereby cited to comply with the demand contained in the supplemental and amended petition, a certified copy of which accompanies this citation, or to file your answer or other pleading to said supplemental and amended petition in the office of the Clerk of the First Judicial District Court in the Caddo Parish Court House in the City of Shreveport in said Parish within the time remaining for pleading to the original petition heretofore served upon you or within ten (10) days after service hereof, whichever period is longer. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS the Honorable Judges of our said Court on this date November 28, 2018.

OTHER: FIRST AMENDED PETITION FOR
 DAMAGES

MIKE SPENCE, CLERK OF COURT

By: _____
 Deputy Clerk

 RON MICIOTTO
 Attorney

FILE COPY

Supplemental Long-Arm Citation

JACKELYN YANONG
VS
JENNY DAWSON COLEMAN, ET AL

NO. 609429 – A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: JENNY DAWSON COLEMAN

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within THIRTY (30) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within THIRTY (30) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date November 28, 2018.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

_____ REQUEST FOR ADMISSIONS OF FACTS

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XX FIRST AMENDED PETITION FOR DAMAGES

By: _____

Deputy Clerk

RON MICIOTTO

Attorney

FILE COPY