

STATE OF SOUTH CAROLINA

COUNTY OF EDGEFIELD

Jamie Lynn Corbett, as Personal
Representative of the Estate of Allo
Alexandria Corbett

Plaintiff,

vs.

Raymond Baylen Gaillard,

Defendant.

IN THE COURT OF COMMON PLEAS

CASE NUMBER: 2025-CP-19-

SUMMONS

(Jury Trial Demanded)

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

MORGAN & MORGAN, P.A.

/s/ Kelsey E. Saalman

Kelsey E. Saalman, Esq.

SC Bar No. 106508

1901 Main Street, Ste. 1200

Columbia, SC 29201

Telephone: (803) 679-4258

Facsimile: (854) 429-6941

E-Service: ksaalman@forthepeople.com;

cvorhis@forthepeople.com;

Tusami.floresca@forthepeople.com

Attorney for Plaintiff

November 6, 2025
Columbia, SC

STATE OF SOUTH CAROLINA

COUNTY OF EDGEFIELD

Jamie Lynn Corbett, as Personal
Representative of the Estate of Allo
Alexandria Corbett

Plaintiff,

vs.

Raymond Baylen Gaillard,

Defendant.

IN THE COURT OF COMMON PLEAS

CASE NUMBER: 2025-CP-19-

COMPLAINT

(Jury Trial Demanded)

Plaintiff Jamie Lynn Corbett, as Personal Representative of the Estate of Allo Alexandria Corbett, by and through undersigned counsel, complains of Defendant Raymond Baylen Gaillard and alleges as follows:

PARTIES, VENUE, AND JURISDICTION

1. Plaintiff Jamie Lynn Corbett (“Plaintiff”) is or will be the duly appointed Personal Representative of the Estate of Allo Alexandria Corbett. As duly appointed Personal Representative of the Estate, Plaintiff has authority to bring this wrongful death action on behalf of Decedent Allo Alexandria Corbett’s beneficiaries under the South Carolina Wrongful Death Act, S.C. Code section 15-51-10 et seq., and to bring a survival action on behalf of the Estate under S.C. Code section 15-5-90.

2. Plaintiff Jamie Lynn Corbett is a citizen and resident of Edgefield County.

3. Defendant Raymond Baylen Gaillard (“Defendant”) is a resident and citizen of Edgefield County, South Carolina.

4. Venue is proper in Edgefield County because the acts and omissions giving rise to the action occurred in Edgefield County and Defendant is a resident of Edgefield County.

5. This Court has personal jurisdiction over the parties and subject matter jurisdiction over the issues involved in this case.

GENERAL FACTUAL ALLEGATIONS

6. The motor vehicle crash that killed Allo Alexandria Corbett (“Decedent”) occurred around 04:20 AM on February 8, 2025 on SC 230 Martintown Road.

7. Decedent was operating an electric-scooter west on SC 230 Martintown Road in Edgefield County, South Carolina.

8. Defendant was driving a truck east on SC 230 Martintown Road when he crashed head on into Decedent’s electric-scooter and her person.

9. As a direct result of the crash caused by Defendant, Decedent sustained fatal injuries from which she ultimately succumbed.

FOR A FIRST CAUSE OF ACTION

(Decedent Estate’s Negligence/Recklessness, Negligence *Per Se* Against Defendant)

10. Plaintiff realleges and reincorporates the preceding paragraphs as if repeated verbatim here.

11. Defendant owed a duty to Decedent to operate Defendant’s vehicle in a safe and reasonable manner, and in accordance with all state and federal laws and regulations.

12. Defendant breached this duty to use due care in operating Defendant’s vehicle and was negligent, negligent *per se*, reckless, willful, and/or wanton in numerous particulars, including but not limited to:

- a. Failing to obey traffic signs and signals;
- b. Failing to yield the right of way;

- c. Failing to keep a proper lookout;
- d. Driving while inattentive and/or distracted;
- e. Failing to use the degree of care and skill that a reasonable person would have used under the same or similar circumstances;
- f. Acting with conscious disregard for the safety of others, including Plaintiff;
- g. Acting in violation of applicable state and federal statutes and regulations; and
- h. Committing other acts and omissions as discovery may reveal and the evidence at trial may show.

13. Defendant's acts and omissions were the direct and proximate cause of Decedent's death and damages to her Estate claimed herein.

14. As a direct and proximate result of Defendant's acts and omissions, Decedent's Estate and beneficiaries suffered the following damages:

- a. pecuniary loss;
- b. loss of services;
- c. pain and suffering;
- d. mental anguish;
- e. loss of companionship;
- f. loss of consortium;
- g. loss of society, including the loss of their experience, knowledge, and judgment in managing the affairs of themselves and their beneficiaries, and;
- h. other damages as will be shown in the discovery and trial of this case.

15. Because Decedent's death was a direct result of Defendant's violation of his duties described above, Plaintiff is entitled to actual and compensatory damages in the amount the jury

determines at the trial of this case.

16. Plaintiff is also entitled to an award of punitive damages against Defendant.

17. Plaintiff is also entitled to an award of prejudgment interest against Defendant.

WHEREFORE, Plaintiff asks this Court to enter judgment against Defendant for the Plaintiff's actual and punitive damages in an amount to be determined by the jury, for the reasonable costs of this action, and for such other and further relief as the Court may deem just and proper.

DEFENDANT AND DEFENDANT'S ATTORNEY ARE ADVISED THAT PLAINTIFF HAS SERVED DISCOVERY REQUESTS WITH THIS SUMMONS AND COMPLAINT, INCLUDING INTERROGATORIES, REQUESTS FOR PRODUCTION, AND REQUESTS TO ADMIT. RESPONSES TO THESE DISCOVERY REQUESTS ARE DUE WITHIN 45 DAYS PER THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE. IF DEFENSE COUNSEL LACKS COPIES OF ANY DISCOVERY REQUEST, CONTACT PLAINTIFF'S COUNSEL.

MORGAN & MORGAN, P.A.

/s/ Kelsey E. Saalman

Kelsey E. Saalman, Esq.

SC Bar No. 106508

1901 Main Street, Ste. 1200

Columbia, SC 29201

Telephone: (803) 679-4258

Facsimile: (854) 429-6941

E-Service: ksaalman@forthepeople.com;

cvorhis@forthepeople.com;

Tusami.floresca@forthepeople.com

Attorney for Plaintiff

November 6, 2025

Columbia, SC