

**IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA**

**ANDREW DOSS, as Personal** §  
**Representative of the Estate of Ada** §  
**Doss, Deceased,** §  
 §  
**Plaintiff,** §

v.

Case No.: CV-2026-\_\_\_\_\_

**THE DCH HEALTH CARE** §  
**AUTHORITY, a domestic corporation,** §  
**UNIVERSAL PROTECTION** §  
**SERVICE, LLC, d/b/a Allied Universal** §  
**Security Services, a foreign limited** §  
**liability company, MATTHEW** §  
**TAYLOR, an individual, and Fictitious** §  
**Defendants 1, as follows:** §

**JURY DEMAND**

No. 1, whether singular or plural, those individuals or corporations, other than the named parties, who were responsible for the security of The DCH Health Care Authority Tuscaloosa campus, on or about May 12, 2026. Plaintiff avers that the identities of the Fictitious Parties described above are otherwise unknown to the Plaintiff at this time but that their true names and identities will be substituted by amendment when ascertained. §

§  
**Defendants.** §

**COMPLAINT**

COMES NOW the Plaintiff, Andrew Doss, as Personal Representative of the Estate of Ada Doss, Deceased, and alleges against the Defendants, The DCH Health Care Authority, Universal Protection Service, LLC, d/b/a Allied Universal Security Services, Matthew Taylor and Fictitious Defendants, as follows:

**PARTIES**

1. Plaintiff, Andrew Doss, is a resident citizen of Tuscaloosa County, Alabama and is over the age of nineteen (19) years. He brings this action as Personal Representative of the Estate of Ada Doss, Deceased.

2. Defendant The DCH Health Care Authority (hereinafter "DCH") is a domestic corporation with its principal place of business in Tuscaloosa County, Alabama.

3. Defendant Universal Protection Service, LLC, d/b/a Allied Universal Security Services (hereinafter "Allied") is a foreign limited liability company organized under the laws of North Carolina has its principal place of business in North Carolina and provides security services for The DCH Health Care Authority located at 809 University Boulevard East, Tuscaloosa, Alabama 35401.

4. Defendant Matthew Taylor (hereinafter "Taylor"), upon information and belief, is a resident citizen of Tuscaloosa County, Alabama, and over the legal age of nineteen (19) years.

5. Defendant No. 1, whether singular or plural, those individuals or corporations, other than the named parties, who were responsible for the security of The DCH Health Care Authority Tuscaloosa campus, on or about May 12, 2026.

6. Plaintiff avers that the identities of the Fictitious Parties described above are otherwise unknown to the Plaintiff at this time but that their true names and identities will be substituted by amendment when ascertained.

### STATEMENT OF FACTS

7. On May 12, 2026, Ada Doss was employed as a registered nurse at The DCH Healthcare Authority (“DCH”), devoting her life to providing healthcare to the patients of DCH hospital.

8. At the end of her work shift on May 12, 2026, Ada Doss exited DCH enroute to the south parking lot. As customary, she called her husband to discuss their respective works days, dinner plans and evening routines for their 6-month-old and two-year-old daughters.

9. Unbeknownst to Ada Doss, Matthew Taylor (hereinafter “Taylor”), was transported, earlier in the day, to the DCH Emergency Room entrance by an unidentified individual complaining of a manic episode. After being notified of Taylor’s alleged manic and erratic behavior, Allied security personnel and DCH security personnel failed to assess the security threat and act to locate Taylor.

10. Instead, Taylor was allowed to leave the DCH emergency room entrance area and roam freely about the DCH campus unmonitored for hours. Neither DCH security personnel, nor Allied security personnel, ever attempted to locate and confront Taylor, despite him being shirtless, shoeless and armed.

11. That afternoon, as she was walking to her vehicle located in the DCH South parking lot, and speaking to her husband by phone, Ada Doss’ voice filled with fear and panic as Taylor approached her armed with a gun.

12. Tragically, Ada's husband, Andrew Doss, was forced to endure hearing his wife's last words of, "please don't, I have babies", seconds before Taylor shot and killed Ada Doss in the south parking lot of the DCH campus.

**COUNT ONE**

**(Negligence/Wantonness)**

13. The Plaintiff realleges all prior paragraphs of the Complaint as if set out fully herein.

14. On or about the 12<sup>th</sup> day of May 2026, the Defendants, DCH, Allied and Taylor, negligently and/or wantonly caused the death of Ada Doss.

14. The Defendants'<sup>1</sup>, DCH, Allied, Taylor and Fictitious Defendants, actions were negligent, wanton, reckless, and the Plaintiff is hereby entitled to compensatory and punitive damages.

15. As a proximate result of the conduct of the Defendants, Ada Doss was caused to die.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff demands judgment against the Defendants, including Fictitious Defendants, for compensatory and punitive damages.

---

<sup>1</sup> The term "Defendant" and/or "Defendants" is used interchangeable to refer to all or one of the Defendants, including, but not limited to the individually named Defendants and/or Fictitious Defendants.

**COUNT TWO**

**(Wrongful Death Pursuant to Alabama Code § 6-5-410)**

16. The Plaintiff realleges all prior paragraphs of the Complaint as if set out fully herein.

17. On or about the 12<sup>th</sup> day of May 2026, DCH, Allied and Taylor negligently, recklessly and/or wantonly caused the death of Ada Doss.

18. As a proximate result of the conduct of the Defendants, Ada Doss sustained injuries resulting in her death.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff demands judgment against the Defendants, including Fictitious Defendants, for punitive damages.

**COUNT THREE**

**(Combining and Concurring)**

19. The Plaintiff realleges all prior paragraphs of the Complaint as if set out fully herein.

20. The actions and/or inactions of the Defendants combined and/or concurred to cause injury, harm and death to Ada Doss.

21. As a proximate result of the conduct of the Defendants, Ada Doss was caused to die.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff demands judgment against the Defendants, including Fictitious Defendants, for compensatory and punitive damages.

**REQUEST FOR RELIEF**

**WHEREFORE, PREMISES CONSIDERED**, the Plaintiff demands judgment against the defendant for compensatory and punitive damages, plus interest, attorney fees, and costs.

**PLAINTIFF REQUESTS TRIAL BY JURY**

Done this 17<sup>th</sup> day of June 2026.

PATTERSON LAW FIRM  
1323 Hargrove Road East  
Tuscaloosa, Alabama 35405  
Telephone: (205) 345-1000  
Facsimile: (205) 507-1022

*s/Paul W. Patterson, II*  
Paul W. Patterson, II (PAT-048)

*s/North Patterson*  
North Patterson (PAT-114)

DEMPSEY, STEED, STEWART,  
RITCHEY & GACHE, LLP  
1122 22<sup>nd</sup> Street North  
Birmingham, Alabama 35234  
Telephone: (205) 328-0162  
Facsimile: (205) 328-0172

*s/Randy A. Dempsey*  
Randy A. Dempsey (DEM-006)

**DEFENDANTS' ADDRESSES TO BE SERVED BY CERTIFIED MAIL, RETURN-RECEIPT REQUESTED:**

**The DCH Health Care Authority  
c/o Legal Department  
809 University Boulevard East  
Tuscaloosa, AL 35401**

**Universal Protection Service, LLC,  
d/b/a Allied Universal Security  
Services  
c/o Corporation Service Company, Inc.  
641 South Lawrence Street  
Montgomery, AL 36104**

**Matthew Taylor  
607 Main Avenue, #619  
Northport, AL 35476**