

2026-001070

Shanda Tate

204 Arrow Wood Dr. Apt.102

864-325-4193

prettydiamond79@gmail.com

STATE OF SOUTH CAROLINA

COUNTY OF Spartanburg

IN THE COURT OF COMMON PLEAS

Seventh JUDICIAL CIRCUIT

Case No.: 2026-CP42-000934

Shanda Tate, Individually, and as Parent

and Natural Guardian of Kivee Boozer

a minor; and BERNARD LOGAN, Co-

Plaintiffs,)

) **SUMMONS**

v.

RECEIVED

Jun 30 2026

SC Court of Appeals

2026-001070

The Grove Apartments, Erica Estes

Defendant.

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the plaintiffs at the address listed above, within thirty (30) days after the service hereof, exclusive of the day of such service. [1]

IF YOU FAIL TO ANSWER THE COMPLAINT within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

Dated: June 29, 2026

Respectfully submitted,

Shanda Tate

Plaintiff pro se

STATE OF SOUTH CAROLINA

COUNTY OF Spartanburg

2026-001070

IN THE COURT OF COMMON PLEAS

Case No.: 2026-CP42-000934

Shanda Tate, Individually, and as Parent

and Natural Guardian of Kivee Boozer,

a minor; and BERNARD LOGAN,

Plaintiffs,

COMPLAINT

v. **(JURY TRIAL DEMANDED)**

The Grove Apartments, Erica Estes,

Defendant.) [1]

The Plaintiffs, Shanda Tate (individually and on behalf of their minor child, Kivee Boozer) and Bernard Logan, representing themselves *pro se*, bring this action against the Defendant, Erica Estes, and allege as follows: [1]

PARTIES AND JURISDICTION

1. Plaintiffs are citizens and residents of South Carolina.
2. Plaintiff Shanda Tate the parent and natural guardian of the minor child, Kivee Boozer, who resided at the subject property.

3. Plaintiff Bernard Logan was the lawful co-signer on the residential lease agreement for the subject property.
4. Defendant was the owner/manager of the rental property located at 204 Arrow Wood Rd. Apt.102, The Grove Apartments.
5. This Court has jurisdiction because the amount in controversy exceeds lower court limits, and the wrongful acts occurred in this county. [1]

FACTUAL ALLEGATIONS

6. Plaintiffs entered into a lease agreement with Defendant for the Property, with Bernard Logan serving as the co-signer.
7. During the tenancy, severe toxic mold developed at the Property due to Defendant's failure to properly maintain the premises. Defendant ignored explicit notifications and completely refused to respond to the South Carolina Department of Consumer Affairs.
8. As a direct result of the toxic mold exposure, Shanda Tate and the minor child suffered severe physical injuries, respiratory illnesses, and medical complications.
9. Defendant engaged in an ongoing, malicious pattern of extreme harassment, misconduct, and wrongful eviction against the tenants, destroying their clothing and furniture.
10. As part of this pattern of misconduct, Defendant maliciously targeted, harassed, and intimidated the co-signer, Bernard Logan, causing him severe distress and professional/personal disruption.
11. The continuous harassment and abrupt wrongful eviction caused severe psychological trauma to the minor child, resulting in stress-induced hair loss.
12. The displacement caused by Defendant's actions directly caused Plaintiffs profound emotional distress and stripped them of critical time with their sick mother/grandmother and grandchildren. [1]

2026 - 001070

CAUSES OF ACTION

FIRST CAUSE OF ACTION

(Breach of Habitability / South Carolina Residential Landlord Tenant Act)

13. Plaintiffs repeat all prior paragraphs. Defendant breached the legal duty to keep the premises safe, clean, and habitable, violating the lease agreement backed by Bernard Logan.

SECOND CAUSE OF ACTION

(Negligence & Personal Injury - Toxic Mold Exposure)

14. Plaintiffs repeat all prior paragraphs. Defendant negligently breached their duty of care, directly causing physical illness and medical harm to the residents.

THIRD CAUSE OF ACTION

(Defamation / Slander)

15. Plaintiffs repeat all prior paragraphs. Defendant intentionally published false, malicious statements about Plaintiffs to third parties, destroying their character and reputation. [1]

FOURTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

16. Plaintiffs repeat all prior paragraphs. Defendant's targeted harassment of a mother, a minor child, and their co-signer, Bernard Logan, was extreme, outrageous, and calculated to cause severe emotional and physical distress.

2026-001070

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment against Defendant for:

- a. Actual, compensatory, and consequential damages for medical costs, property damage, and emotional distress for all Plaintiffs;
- b. Punitive damages for Defendant's malicious harassment, retaliation, and defamation;
- c. Total financial damages in the amount of **\$400,000**; and
- d. Any such further relief as this Court deems just and proper. [1, 2]

Dated: June 29, 2026

Respectfully submitted,

Shanda Tate, Bernard Logan

Plaintiff pro se Plaintiff pro se

Important Next Step

If Bernard Logan joins the lawsuit as a co-Plaintiff, **he must sign the bottom of the complaint with you** when you file it at the courthouse.

To finalize the specific court details on the first page, please let me know:

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Jun 30 2026

SC Court of Appeals

APPEAL FROM Spartanburg COUNTY
Court of Common Pleas

Dee Ann Cole Jr, Circuit Court Judge

Case No. 2026 - CP 42 - 000934

Shanda Tate
Bernard Logan,

Appellant/Respondent,

v.

Kasey Fowler
The Grove,

Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served the Civil Lawsuit on Kasey Fowler by depositing
(Document) (Name)
a copy of it in the United States Mail, postage prepaid, on June 30, 2026, addressed to,
(Date)
P.O. Box 5269 Greenville SC 29606
Civil lawsuit

Date: June 30, 2026

s/ Shanda Tate, Bernard Logan
Address: 201 Lebow Wood RD Apt 102
Spartanburg SC 29301