

## Hopkins, Debbie

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**From:** Jordan Calloway <jordan@mcgowanhood.com>  
**Sent:** Tuesday, January 15, 2019 11:41 AM  
**To:** Hopkins, Debbie  
**Subject:** Wright v. PRG Real Estate Mgmt. et al. (Appellate Case No. 2015-001921)  
**Attachments:** D. Wright--Appendix Pages Redacted.pdf

I am attaching Page 364 of the Appendix that has been corrected to redact personal identifying information. The attachment also includes four additional pages that we mistakenly failed to redact when the appendix was originally filed. These include Page 520 and 729 from Appendix Volume 2 as well as Pages 816-17 from Appendix Volume 3.

Thanks,

Jordan Calloway  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732  
(803) 327-7800

7 Q. Tell me what your current address is.

8 A. 100 Walden Heights Drive, Apartment 712,  
9 Irmo, South Carolina.

10 Q. How long have you lived at the Walden  
11 address?

12 A. Moved in there in 2009.

13 Q. Have you ever gone by any other names than  
14 Denise Antoninette Wright?

15 A. Just Toni.

16 Q. Toni?

17 A. Yeah.

18 Q. But no other aliases?

19 A. No.

20 Q. Haven't changed your name?

21 A. No.

22 Q. Or anything like that?

23 A. No.

24 Q. And is your Social Security number  
25 [REDACTED] ?

0008

1 A. Right.

2 Q. And I've got your date of birth as [REDACTED]  
3 [REDACTED]; is that correct?

4 A. No.

5 Q. I'm sorry. Tell me what your --

6 A. [REDACTED].

7 Q. All right. Do you drive?

8 A. Yes.

9 Q. Do you have any restrictions on your  
10 license?

11 A. Contact lens.

12 Q. What blood pressure medication are you  
13 taking right now?

14 A. Verapamil.

15 Q. Let me ask you a little bit about your  
16 family. Are you married?

17 A. No.

18 Q. Have you ever been married?

19 A. Yes.

20 Q. Who was your ex-husband?

21 A. John Thomas Wright.

22 Q. Does he live in Columbia?

23 A. Yes, he does.

24 Q. Do you know his current address?

25 A. No.

0009

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
)

IN THE COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

DENISE WRIGHT )  
)  
Plaintiff, )

CASE NO.:2011-CP-40-4068

vs. )

PLAINTIFF'S ANSWERS TO  
DEFENDANT'S FIRST SET OF  
INTERROGATORIES

PRG REAL ESTATE MANAGEMENT, )  
INC., FRANKLIN PINERIDGE )  
ASSOCIATES, JANE DOE )  
INDIVIDUALLY AND IN HER )  
REPRESENTATIVE CAPACITY )  
)  
Defendants. )

TO: BRIAN A. COMER, ESQUIRE, ATTORNEY FOR DEFENDANTS PRG REAL ESTATE MANAGEMENT, INC. AND FRANKLIN PINERIDGE ASSOCIATES:

The Plaintiff herein answers Defendant's First Set of Interrogatories as follows:

1. Set forth the following information about the Plaintiff:
  - a. Full name;
  - b. Social Security Number;
  - c. Date of Birth;
  - d. Driver's license state and number;
  - e. Current address(es);
  - f. Name and address of current employer(s);
  - g. Current salary;
  - h. Name(s) and birthdates of any children;
  - i. Previous addresses for the past ten years; and
  - j. Electronic mail (email) address(es) from 2006 to present.

ANSWER: a. Denise Toni Wright;  
b. 100 Walden Heights, No. 712, Irmo, SC 29063;  
c. Social Security No. [REDACTED];  
d. Date of birth [REDACTED];  
e. Driver's license: South Carolina [REDACTED];  
f. Unemployed;  
g. Children: Tasha Curtis born [REDACTED];

7 Q. Tell me what your current address is.

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9 Irmo, South Carolina.

10 Q. How long have you lived at the Walden  
11 address?

12 A. Moved in there in 2009.

13 Q. Have you ever gone by any other names than  
14 Denise Antoninette Wright?

15 A. Just Toni.

16 Q. Toni?

17 A. Yeah.

18 Q. But no other aliases?

19 A. No.

20 Q. Haven't changed your name?

21 A. No.

22 Q. Or anything like that?

23 A. No.

24 Q. And is your Social Security number  
25 [REDACTED]?

0008

1 A. Right.

2 Q. And I've got your date of birth as [REDACTED]  
3 [REDACTED], is that correct?

4 A. No.

5 Q. I'm sorry. Tell me what your --

6 A. [REDACTED]

7 Q. All right. Do you drive?

8 A. Yes.

9 Q. Do you have any restrictions on your  
10 license?

11 A. Contact lens.

12 Q. What blood pressure medication are you  
13 taking right now?

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15 Q. Let me ask you a little bit about your  
16 family. Are you married?

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18 Q. Have you ever been married?

19 A. Yes.

20 Q. Who was your ex-husband?

21 A. John Thomas Wright.

22 Q. Does he live in Columbia?

23 A. Yes, he does.

24 Q. Do you know his current address?

25 A. No.

0009

1. I am Timir Patel, a resident of Richland County, South Carolina.
2. From approximately 2006 to 2007 I resided in [REDACTED] at Wellspring Apartments, located at [REDACTED]
3. On October 18, 2007 my apartment was burglarized. The door and entrance area to my apartment were hidden from passers-by with foliage that was overgrown during the time that I resided in this apartment. At the time of this burglary the door that was forced open was not easily visible because of this foliage. During the time that I resided in this apartment my wife voiced complaints regarding this overgrown foliage however the foliage was never cut back enough to make us feel secure
4. Also, while we were residents of Wellspring Apartments we had concerns about exterior lighting that was intended to illuminate the area around our building. It was our experience that the exterior lighting which we utilized to come and go from our building was out approximately 60% of the time. We complained at least twice and were told that the problems would be resolved. After these complaints the lighting would work only sporadically and never illuminated the area for any extended periods of time. Eventually, my wife and I moved away from this complex in part due to safety and security concerns that we had regarding the foliage and lighting.
5. Attached to this affidavit as Exhibit A is the incident report from the above referenced burglary. This testimony has been freely given and reflects my recollection of these matters of which I have personal knowledge.



\_\_\_\_\_  
Timir Patel

Sworn to before me

this 19<sup>th</sup> day of April 2011.



My Commission Expires: 6/1/16

RICHLAND COUNTY SHERIFFS DEPT  
SCD400000

**INCIDENT REPORT**

INFORMATION ONLY

CASE NUMBER  
0710070808

NCIC  
INQ. INTD.

INCIDENT TYPE	COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
1. 220 R-4 BURGLARY/ATTEMPTED	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	RESIDENCE/HOME		<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Inst <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
2. 280 280 DESTRUCTIVE/DAMAGE/VANDALISM OF PROPERTY	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	RESIDENCE/HOME		
3.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER) \_\_\_\_\_ ZIP CODE 29212 WEAPON TYPE \_\_\_\_\_

INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISP. DATE	DISP. TIME	THIS ARRIVED	DEPART. TIME	LOCATION NO.
10/08/2007	11:04		10/08/2007	11:10	10/08/2007	11:15	11:40	12:00	10

COMPLAINANT'S NAME (LAST, FIRST, MIDDLE) PATEL, TIMIR, K RELATIONSHIP TO SUBJECT \_\_\_\_\_ RESIDENT  RACE/SEX W M AGE 28 / ETH N DAYTIME PHONE 803-467-1249 EVENING PHONE \_\_\_\_\_

ADDRESS \_\_\_\_\_ CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP CODE \_\_\_\_\_ LOCATION NO. \_\_\_\_\_

VICTIM'S NAME (LAST, FIRST, MIDDLE) PATEL, TIMIR, K RELATIONSHIP TO SUBJECT \_\_\_\_\_ RESIDENT  RACE/SEX W M AGE 28 / ETH N DAYTIME PHONE 803-467-1249 EVENING PHONE \_\_\_\_\_

HEIGHT 508 WEIGHT 160 HAIR BLK EYES BRO FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC. \_\_\_\_\_

ADDRESS \_\_\_\_\_ CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP CODE \_\_\_\_\_ LOCATION NO. \_\_\_\_\_

VEHICLE INJURY (MCI)  YES  NO EXPLAIN \_\_\_\_\_ COMPLAINT OF FANNON VEHICLE USER  YES  NO

VICIM (NO) USING ALCOHOL  YES  NO  UNK  DRUGS  YES  NO  UNK  TYPE \_\_\_\_\_

TWO WARRIORS  ONE WARRIOR  DETECTIVES  FLASK  OTHER  ALONE  ASSISTED  \*This Jurisdiction S-State O-Out of State U-Unknown.

SUSPECT NAME (LAST, FIRST, MIDDLE) UNKNOWN, BLACK, MALE RACE/SEX B M AGE 00 / ETH N DATE OF BIRTH \_\_\_\_\_ HEIGHT 808 WEIGHT 160 HAIR BLK EYES BRO

RUNAWAY FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC. \_\_\_\_\_ DAYTIME PHONE \_\_\_\_\_ EVENING PHONE \_\_\_\_\_

WANTED ADDRESS \_\_\_\_\_ CITY \_\_\_\_\_ STATE SC ZIP CODE \_\_\_\_\_ LOCATION NO. \_\_\_\_\_

ARREST SUBJECT (NO) USING ALCOHOL  YES  NO  UNK  DRUGS  YES  NO  UNK  TYPE \_\_\_\_\_ APRESTED NEAR OFFENSE SCENE  YES  NO  DATE/TIME OF OFFENSE 10/8/2007 11:04:00 AM DATE/TIME OF ARREST \_\_\_\_\_

JAIL TOTAL # ARRESTED \_\_\_\_\_

SUBMIONS DAY OF THE WEEK HOW REPORTED A- OFFICER DISPATCHED ON CALL B- REPORT TAKEN BY PHONE C- COMPLAINANT WALKED IN D- COMPLAINT WRITTEN IN E- OFFICER INITIATED F- OTHER G- RESISTANCE/HOSTILITY H- WEAPONS I- UNFOUNDED CALLS J- MENTAL SUBJECT K- COMPLAINANT PRE-SENTLY INTOXICATED L- DOMESTIC M- NORMAL

R-4 BURGLARY/ATTEMPTED 220

CONTACT WAS MADE WITH C/V AND WITNESS AT W. WITNESS STATED HE OBSERVED TWO B/M SUSPECTS OUTSIDE THE C/V RESIDENCE, THE WITNESS THEN HEARD A LOUD NOISE AT WHICH TIME HE YELLED AT THE SUSPECTS AND THEY RAN OFF. THE SUSPECTS HAD FORCED THE FRONT DOOR, BY UNKNOWN MEANS, OPEN BUT FAILED TO MAKE ENTRY DUE TO THE WITNESS. C/V STATED NO ITEMS WERE MISSING AND NOTHING SEEMED TO HAVE BEEN DISTURBED. C/V WAS ISSUED A CASE NUMBER AND CVR FORM.

EST. DAMAGE TO DOOR: \$500.00

JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY \_\_\_\_\_ JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY \_\_\_\_\_

TYPE(GROUP)	28	TOTAL VALUE
STOLEN	0	0
DAMAGED	500	500
BURNED	0	0
RECOVERED	0	0
SEIZED	0	0

SUBJECT IDENTIFIED  YES  NO  SUBJECT LOCATED  YES  NO  G. F. \_\_\_\_\_  ACTIVE  ADM. CLOSED  UNFOUNDED  ARRESTED UNDER 18  ARRESTED 18 AND OVER  EX-CLEAR UNDER 18  EX-CLEAR 18 AND OVER

REASON FOR EXCEPTIONAL CLEARANCE: 1  OFFENDER 60% 2  NO PROSECUTION 3  EXTRADITION DENIED 4  VICIM DELINES COOPERATION 5  JUDGE IN CUSTODY

REPORTING OFFICER(S) Kirland, William DATE 10/8/2007 UNIT NUMBER 1337 APPROVING OFFICER Kirland, William DATE 10/8/2007 UNIT NUMBER \_\_\_\_\_

FOLLOW UP INVESTIGATION  YES  NO  OFFICER UNDER 10/8/2007 8:00:00 AM 815

AGENCY: RICHLAND COUNTY SHERIFFS  
ORI #: SCD400000

**PLAINTIFF'S EXHIBIT**  
A