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THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Cordell Maddox Jr, Circuit Court Judge

Case No. 2018-CP-04-01409

Taranika Subrina Webb

Appellant,

v.

Fairview Gardens/George
Reeves/Phillips McWilliams

Respondents

BRIEF OF APPELLANT

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SC Court of Appeals

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Arguments

1. BECAUSE RESPONDENT COULD HAVE REQUEST THAT THE CASE BE
DISMISSED WITH PREJUDICE IN PREVIOUS DOCUMENTS AND COURT.

2. BECAUSE OF RULE 12(b)(6) THIS CASE SHOULD HAVE NEVER BEEN
DISMISSED.

3. BECAUSE THE JUDGE MADE AND ERROR BY NOT SUBMITTING A
FORM 4
BECAUSE THIS IS A CRIME 16-17-47

4. EAVESDROPPING, PEEPING, VOYERURISM.

Conclusion..... 2

STATEMENT OF ISSUES ON APPEAL

1. BASED ON RULE 12(b)(6) THIS CASE SHOULD HAVE NEVER BEEN DISMISSED.
2. DID THE TRIAL COURT ERR IN ACCEPTING AND PROPOSED ORDER DISMISSING WITH PERJUDICE FROM THE DEFENDANT AFTER COURT ON MARCH 19,2019?
3. DID JUDGE ERR IN NOT SUBMITTING A FORM 4?
4. DID THE COURT ERR IN FAILING TO ACCEPT A STATEMENT FROM THE CORPORATE OFFICE? THAT LEAVING KEYS INSIDE A TENANT APARTMENT IS AGAINST THAT COMPANYS POLICYS.
5. DID THE JUDGE ERR BY REQUESTING THE COMPANY TO MOVE THE DEFENDANT PERPETRATOR?
6. ACCORDING TO RULE 12(b)(6) A COURT MAY DISMISS A CLAIM WHEN THE DEFENDANT DEMONSTRATES THAT THE PLAINTIFF HAS FAILED TO STATE FACTS SUFFICIENT TO CONSTITUTE A CAUSE OF ACTION” IN THE PLEADING FILED WITH THE COURT. IN THIS CASE THERE WAS A NUMBER OF FACT SO CASE SHOULD HAVE NEVER BEEN DISMISSED.
- 7.

INVASION OF PRIVACY

- A. WRONGFUL INTRUSION INTO PRIVATE AFFAIRS (PEEPING TOM).
- B. AN INTRUSION INTO WHICH IS PRIVATE. MY LEASE AND HANDBOOK STATES THAT THIS IS MY PRIVATE PLACE MY HOME.
- C. THAT IS SUBSTANTIAL AND UNREASONABLE ENOUGH TO BE LEGALLY COGNIZABLE PEEPING TOM, STEALING MAIL, AND EVAESDROPPING DEVICE.
- D. THAT DEFENDANT ‘S ACT OR COURSE OF CONDUCT WAS INTENTIONAL. THE MOMENT I MOVED ON THIS PROPERTY THIS TENANT WAS DOING THINGS LIKE KICKING MY DOOR AND STEALING MAIL. THE MOMENT HE MOVED RIGHT NEXT DOOR TO ME I STARTED TO HEAR HIM IN HIS APARTMENT TELLING ME THING LIKE WHAT I WAS READING WORD FOR WORD WHAT COLOR BRA, AND THE COLOR PANTIES I WAS WEARING.ETC THIS ACT WAS INTENTIONAL BECAUSE HE REQUESTED THAT APARTMENT.
- E. THE RESULT OF THIS WAS TO BRING HUMATION AND SHAME TO ME. THE PURPOSE OF THIS DEVICE WAS TO RECORD ME AND MY FAMILY IN OUR HOME THIS PERSON AND TO STEAL OUR IDENTITY. PERFORM PREVERT ACTS

TABLE OF AUTHORITIES*

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S.C. Code Ann. § 31-3-30-3-910.....2
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OTHER AUTHORITIES

ERIN ANDREWS VS MARRIOTT2
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STATEMENT OF THE CASE

ON SEPTEMBER 28, 2018 THE PLAINTIFF (TARANIKA SUBRINA WEBB) FILED A CASE AGAINST A FAIRVIEW GARDENS APARTMENT FOR BREACH OF CONTRACT, INVASION OF PRIVACY, AND NEGLIGENCE. ON JANUARY 11, 2019 WE HELD COURT IN ANDERSON COUNTY THE JUDGE PRESIDING WAS THE HONORABLE SCOTT SPROUSE. AFTER CAREFUL CONSIDERATION JUDGE SPROUSE ORDER FOR THE PLAINTIFF TO SUBMIT AND AMENDED COMPLAINT. ON JANUARY 23, 2019 THE AMENDED COMPLAINT WAS SUBMITTED. ON NOVEMBER 28, 2018 I CAME HOME FOR WORK AND NOTICE KEYS HANGING IN MY DOOR OF MY APARTMENT AND A HOST OF TENANT AT THE DOOR. LEASE OFFICER AT LUNCH. I CALLED THE CORPORATE OFFICE AND TALKED TO A SIMONE PERNELL AND SHE STATED THAT THIS SHOULD HAVE NEVER HAPPENED AND THIS IS AGAINST COMPANY POLICY. INVASION OF PRIVACY THERE IS A TENANT THAT LIVED IN THE APARTMENT THAT LIVES IN THE APARTMENT NEXT TO PLAINTIFF THAT HOOKED UP A DEVICE TO LOOK INSIDE MY APARTMENT I CAN HEAR THAT TENANT TALKING SAYING THINGS THAT'S HAPPENING IN MY HOME. AND BREACH OF CONTRACT BECAUSE IN THE HANDBOOK IT PROMISE TO PROVIDE AND MAINTAIN A PLEASANT LIVING ENVIRONMENT (HABITABLE) ORDER DEFENDANT TO MOVE ME BUT THEY DID NOT ALSO THE JUDGE GRANTED NEGLIGENCE IN THE COURT BUT THE CASE WAS DISMISSED WITH PREJUDICE APRIL 5, 2019.

FACTS

THE FACTS IN THIS CASE IS THAT THERE IS A LEASE AGREEMENT BETWEEN THE PLAINTIFF AND THE DEFENDANT.

THAT THE CORPORATE OFFICE/FAIRVIEW GARDENS KNEW ABOUT THE PEEPING TOM FOR MANY MONTHS.

THAT THERE IS A CORPORATE OFFICE STATEMENT IN THIS CASE STATING THAT LEAVING KEYS INSIDE THE APARTMENT BUILDING IS AGAINST COMPANY POLICY.

THAT THIS TENANT HOOKED UP A DEVICE AND WAS LOOKING IN THE HOME AND THE PLAINTIFF COULD HEAR THE SPEAKING/TALKING ABOUT THINGS GOING ON IN MY HOME.

CONCLUSION

For the reasons stated, this Court should reverse the judgment of the circuit court.

Respectfully submitted,

August 23, 2019

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PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
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APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

CORDELL MADDOX JR. Circuit Court Judge

Case No. 2019-000754

Taranika Subrina Webb

Appellant

v.

Fairview Gardens/Phillips
McWilliams/George Reeves

Respondents

PROOF OF SERVICE

I certify that I have served the Amended Brief on Fairview Gardens by depositing a copy of it in the United States Mail, postage prepaid, on September 3, 2019, addressed to Their attorney of record, George Reeves/Phillip McWilliams 1320 Main Street Suite 750 Columbia South Carolina 29201

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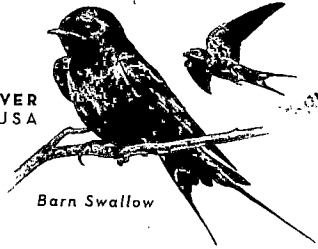
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