

**FORM 13
BRIEF OF APPELLANT***

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

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Oct 14 2020

SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2019-CP-38-00655

Glenfield Apartments

Respondent,

v.

Jacquita Funchess,

Appellant.

[INITIAL] BRIEF OF APPELLANT

Jacquita Funchess
1303 Glenfield Circle #j2
Orangeburg, South Carolina 29118
(803) 664-3626
Appellant

STATEMENT OF ISSUES ON APPEAL

1) Why do you feel like the judge should have not rule in Glenfield favor? I feel as if the judge should have been more for the Appellant knowing she could have been badly harmed or even left for dead in her apartment

STATEMENT OF THE CASE

The respondent was aware of the incidents that happen on the property. I want to speak on the fact that even though Mr. Stephane Dalegrand was placed on no trespassing by Orangeburg department of public safety he was still able to come on the premises to harass me knowing that Mr Stephane Dalegrand was on no trespassing and this brings me to where the respondent has cameras and officers including investigators fielder patrolling the area. Yet still I can go outside to talk to my neighbors and still get attacked by Mr. Stephane Dalegrand . What was the appellant to do in this situation ? Possible get beat or killed or call the police to protect the appellant I JacQuita Funchess and her kids .

FACTS

The respondent knew of every incident that happened on the property with Stephan Dalegrand and I not not one time they they offer to change my apartment or anything, I was called into the office and had a brief meeting with the respondent and Investigator Felder, I feel like the respondent could have did more than what was done even down to the patrol officers, I shouldn't feel unsafe in my apartment on Glenfield property. I don't think the respondent did their job nor the Department of public safety with keeping me or my kids safe knowing Mr Dalegrand was placed on a no trespass October 25, 2018

ARGUMENTS

I. Should a tenant fall victim to DV and be faced with eviction instead of receiving due diligence ? in the case of Stephane Dalegrand I've always been the victim even after he was placed on a no trespassing October 25th 2018 by Orangeburg department of public safety

II. If the police wasn't involved in none of these incidents what would Mr. Stephane Dalegrand do ? What if the law enforcement wasn't involved and I was killed on the respondent property?

CONCLUSION

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

Respectfully submitted,

October 8, 2020

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Appellant