

**FORM 13  
BRIEF OF APPELLANT\***

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

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Case No. 2019-CP-38-00655

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Glenfield Apartments

Respondent,

v.

Jacquita Funchess,

Appellant.

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[INITIAL] BRIEF OF APPELLANT

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

**RECEIVED**

**Nov 23 2020**

**SC Court of Appeals**

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TABLE OF AUTHORITIES\*

CASES

N/A

STATUTES

N/A

OTHER AUTHORITIES

N/A

## STATEMENT OF ISSUES ON APPEAL

1) Why do you feel like the judge should not have ruled in Glenfield's favor? Because I am a victim of domestic violence. Through no fault of my own I was assaulted. In addition to domestic violence the assailant was charged with unlawful neglect of a child, breaking and entering and placed on no trespass.

## STATEMENT OF THE CASE

The property manager was aware of all incidents occurring on the property. Please note that Mr. Stephane Dalegrand was placed on "no trespass" by Orangeburg Department of Public Safety and was still able to come on the premises to harass me. There are surveillance cameras and officers, including Investigator Felder, patrolling the area. Yet during a brief conversation outside with a neighbor I get attacked by Mr. Stephane Dalegrand. I am the victim.

## FACTS

The property manager knew of every encounter that happened on the property with Stephan Dalegrand. Not once was the offer made to change apartments or suggestions given on how to avoid violence. I should not feel unsafe in my apartment at Glenfield Apartments. I'm not confident in the actions of the property manager or Inspector Felder. I also have some concerns about the Department of Public Safety being fully vested in keeping me and my kids safe knowing Mr. Dalegrand was on "no trespass" and no one appeared to enforce it.

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## 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 "no trespass" October 25th 2018 by Orangeburg Department of Public Safety.
- II. If the authorities were not involved in the incidents, what would Mr. Stephane Dalegrand have done? What if the law enforcement wasn't involved and I and my children were killed on the property?

CONCLUSION

For the reasons stated, this Court should reverse the judgment.

Respectfully submitted,

November 20, 2020

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

**FORM 7  
PROOF OF SERVICE OF A NOTICE OF APPEAL**

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

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Circuit Court Judge Murphy

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Case No. 2020-000405

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Glenfield Apartments

Respondent,

v.

Jacquita Funchess,

Appellant.

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**PROOF OF SERVICE**

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I certify that I have served the transcript on Theodore von Keller, attorney via email on September 24, 2020. I received the transcripts on June 4, 2020.

September 24, 2020

Jacquita Funchess  
1303 Glenfield Apartment #J2  
Orangeburg, South Carolina 29118

**RECEIVED**  
**Nov 23 2020**  
**SC Court of Appeals**