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**FORM 13**  
**AMENDMENT TO INITIAL REPLY BRIEF**

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

**RECEIVED**

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SC Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Roger M. Young, Sr.  
Trial Court case No. 2020CP0800267

Case No. 2020-000629

Paul B. Ferrara, III  
8887 Old University Blvd., Ste. 200  
North Charleston, SC 29406  
as representative  
Of Parkway Village Apartments,  
775 Sangaree Parkway Blvd., APT 22A  
Summerville, SC 29486  
**Respondent**

Lisa Michelle Ray  
775 Sangaree Parkway, APT 5C  
Summerville, SC 29486  
**Appellant**

February 7, 2022 - Lisa Michelle Ray  
775 Sangaree Parkway, APT 5C  
Summerville, SC 29486

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## AMENDMENT RESPONSE TO THE INITIAL BRIEF OF THE RESPONDENT

The following amendments are what I would like to include with my original "Response to the Initial Brief" dated November 3, 2021. These are all concerning what I believe to be unfair practices and/or mistreatment of myself by management at Parkway Village Apartments.

1. On 4/29/19 Jacquetta Elias falsely accused me of threatening her (see attached police report, attachment "A") for detailed information, but from the report you can clearly see that Lisa did not threaten Ms. Elias.
2. On 11/13/19 the apartment maintenance person (John Bentley) came to my apartment to change the smoke alarm, per HUD requirements. I was going outside, but told him that there was a gun in the apartment. When I returned, he was next door and said nothing about the gun. Six (6) days later I received a letter (Lease violation Notice - attachment "B") stating that I had the gun in my hand, and that he felt threatened. This is all untrue. If he truly felt threatened, then the police would have been called. But instead, Jacquetta Elias sent me this lease violations notice letter six (6) days later.

Judge Roger M Young, from the Court of Common Pleas had this same document as an exhibit, but I was not aware that he possessed the document, and it did not show up in the court transcripts. Had I been aware that he had this information, I would have been able to bring up the points above, at that time.

3. Since April of 2020 I have been making my monthly payments on time, but the Apartment complex has been returning them to me, uncashed (but they still charge me a late fee each month, starting in September of 2020). Starting in December of 2021 they started cashing/depositing them. I hand deliver the checks to the office on the first of the month, but they have been holding on to them for a few days before depositing them, and then charging me a late fee (see attachment "C", Resident ledger for details).
4. On 7/9/2019 I was threatened by Danielle Keller, with a baseball bat. Ms. Keller subsequently took the bat to my car. She was arrested and charged with assault and battery (see attachment "D" for police report). She was not, however required to leave the apartment complex, and did not leave the area for at least three (3) months. This is just another example on how the apartment management personnel treat some people differently than others.
5. On January 13, 2020 I was using the laundry area around 8:15pm. I was approached by the emergency maintenance man (Ronald Deltoro), asking me if I would move my cart so that he could lock up the door. The apartment complex had contacted him, stating that I would not allow them to lock up the door. At no point did anyone from apartment complex come to the laundry area (before or after Mr. Deltoro came). They then charged me \$40 because the maintenance man had to make a special trip to the apartment complex. See attachment "E" – picture of me standing by the laundry room, and attachment "F" resident bill.
6. On 4/1/2018 the neighbor in 5B threw Coffee on me. When the office opened I went in to make my first residential complaint. The following week, the neighbors started blocking the common walkway with her chair and table. I complained to the office management, but nothing was done. After speaking to corporate office, they finally had her move her chair and table out of the walkway. This chair/table was in violation of the HUD regulation of blocking common walkways. Subsequent to this, the person in 5B (Edwina Jarrett) filed a false police report on me.

Thank You – Lisa Michele Ray

FORM 7  
PROOF OF SERVICE OF AN AMENDMENT TO INITIAL REPLY BRIEF  
THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM BERKELEY COUNTY  
South Carolina Court of Common Pleas  
Berkeley County Summary Magistrate Court  
Honorable Judge Roger M. Young  
Berkeley County, SC  
Trial Court Case No.: 2020CP0800267  
Appellate case number 2020 000629

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SC Court of Appeals

Paul B. Ferrara, III as representative  
For Parkway Village Apartments,  
775 Sangaree Parkway Blvd., APT 22A  
Summerville, SC 29486  
**Respondent**

Lisa Michelle Ray  
775 Sangaree Parkway Blvd., APT 5C  
Summerville, SC 29486  
**Appellant**

**PROOF OF SERVICE**

I certify that I have served a copy of the (a) Request to amend the Initial Reply Brief, (b) Appellant amendment to the Initial Reply Brief, and (c) Designation of matter to all respondents, by depositing a copy via Certified USPS, postage prepaid, on February 5, 2022 addressed to:

Ferrara Law Firm, PLLC  
Paul B. Ferrara III,  
8887 Old University Blvd.,  
Ste. 200  
North Charleston, SC 29406

State of South Carolina Court of Appeals, case number 2020-00629  
Appeal from Berkeley County South Carolina, Court of Common Pleas, case number 2020-CP 0800267

February 7, 2022 - Lisa Michelle Ray  
775 Sangaree Parkway, APT 5C  
Summerville, SC 29486

Lisa Michelle Ray  
775 Sangaree Parkway, APT 5C  
Summerville, SC 29486

02/07/2022

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FEB 09 2022  
SC Court of Appeals

The Honorable V. Claire Allen  
Chief Deputy Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Lisa Michelle Ray v. Parkway Village Apartments  
Appellate Case No.: 2020-000629

Dear Ms. Allen:

I am requesting that I be able to amend the Initial Reply Brief that I submitted on December 20, 2021. If you do approve this request to amend, I am also including the Proof of Service, the Appellant amendment to the Initial Reply Brief, and the Designation of Matter.

Thank You


Lisa Michelle Ray  
775 Sangaree Parkway, APT 5C  
Summerville, SC 29486

Enclosures

cc: Paul B. Ferrara III

PA RAY  
S SANGAREE PARKWAY  
SUMMERVILLE SC 29486

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SC Court of Appeals



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