

The State OF South Carolina
In The Court of Appeals

RECEIVED

MAR 24 2022

SC Court of Appeals

Taranika Webb, Appellant,

V.

Fairview Gardens/George Reeves, Respondent

Appellate Case No.2019-000754

Appeal from Anderson County

J. Cordell Maddox, Jr., Circuit Court Judge

Appellant goes before the court and ask for This an appeal to be reinstated breach of contract, trial court bias, negligence. This company has a duty to me to have keys locked in a safe place and the only person that should have access to my apartment keys is the property manager and the tenant that leasing that apartment. Corporate office stated that this was against their policy and this shouldn't have happened. Plaintiff has used Authorities threw out this appeal to show cause. These statement are not true read brief if the appellant that been enclosed and you will see that Authorities that was used. Also the trial court used exparte communication (Mallet Vs Mallet 473 S.E.2d 804(1996) when he dismissed the case with prejudice after having a private conversation with defendant. When there is exparte communication the case is sent back to lower court or new trial is issued. This Trial court was bias he was going to rule in their favor regardless even after asking to me moved off the property. The trial judged also asked the defendant to move that guy referring to peeping tom who was not there in the case and who had wronged me by filming me in my home. (Erin Andrews Vs Marriott). Brailsford V. Brailsford 2008.

Taranika Subrina Webb
1922 Batts Lane Apt.D
Clarksville TN,37042

March 18.2022

State Of South Carolina

Case No.

County Of Anderson

2018CP0401409

Taranika Subrina Webb

1101 Williamston RD. APT.14b

Anderson South Carolina 29625

*Amend to
Complaint*

VS

Fairview Gardens/P.K. Management

1101 Williamston RD.

Anderson South Carolina 29624

To the court and the defendant(s):

Since filing the original complaint against the defendant(s), I have become aware of certain facts that existed at the time of original filing but which were ~~not~~ known to me. As a result I now wish to amend the original Complaint to include the following facts, allegations and issue as follows:

Breach of contract- P.K. Management promises in their handbook to maintain a habitable pleasant living environment.

- a. I complained for many months of a peeping tom living in apartment 14a.
After many complaints refused to address the problem.
- b. I contacted the corporate office and asked them to move me off the property
no reply.

18 JAN 29 AM 10:55:41
Anderson, SC COC, CP/BS

Negligence –On November 28, 2018 at around 12:30pm. I came in from work to notice keys hanging from my door and a host of tenants my front door. Leasing officer at lunch.

Invasion of privacy- Because of what they allowed to happen on this property with the peeping tom and refusing to take this complaint serious. When it is a crime and also against HUD rules and policy to allow such a thing as this.

As a result of this amend complaint, I request the court grant to me a judgement against the defendant(s) ten of P.K management apartment at 1500.00 dollars a month equal to 15,000 for the rest of my life. I ask that the previous month be paid starting in November of last year. I ask for the deeds and ownership for each of these apartments or 1 million dollars and two apartments.

Tarazika Webb
Tarazika Webb
1/12/2019

Court bias, breach of Contract, Negligence when
~~not~~ abandoned because the arguments in Webb's
brief,

If you reference the transcript you will see the Judge
was bias in handling case. He ~~was~~ ~~also~~ also commite
ex parte communication when he talked to the
defendant ~~and~~ granted the defendant dismissal ~~with~~
after asking in private conversation prejudice.

~~Defendant did~~
unattended in the apartment door and Plaintiff came home
and found keys hanging in door unattended and
everybody out to lunch. Corporate office stated that
this wasn't supposed to happen.

The State Of South Carolina
In The Court of Appeals
[In The Supreme Court]

RECEIVED
MAR 24 2022
SC Court of Appeals

Appeal From Anderson County
Court Of Common Pleas

Cordell Maddox Jr. Circuit Court Judge
Case No.2019-000754

Taranika Subrina Webb

Appellant

Fairview Gardens/Phillips McWilliams

/George Reeves

Respondent

Proof Of Service

I Certify That I have served the Motion to reinstate case number 2019-00754 to George Reeves by depositing a copy of it in the United States Mail, postage prepaid, on March 18, 2022, addressed to Attorney George Reeves 1320 Main Street Suite 750 Columbia South Carolina 29201

Cc. George Reeves

Court Of Appeal

*

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

RECEIVED

SEP 06 2019

SC Court of Appeals

BRIEF OF APPELLANT

Taranika Subrina Webb
Post Office Box 13133
Anderson, South Carolina 29624
(864) 221-6366
PRO SE

TABLE OF CONTENTS

Table of Authorities ii

Statement of Issues on Appeal 1

Statement of the Case 1

Standard of Review..... 1

Facts 1

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*

CASES

STILES V. ONORATO 457 S.E.2d 601(1995)2
COLE VISION CORP. V. HOBBS 394 S.C. 144,148,714 S.E.2d 539(2011)2
TOUSSAINT V. HAM 292. S.C. 415.357, S.E. 2d8 (1987)2

STATUTES

S.C. Code Ann 16-17-470(2012).....2
S.C. Code Ann. § 31-3-30-3-910.....2
S.C. Code Ann. §16-17-480(1962).....2

OTHER AUTHORITIES

ERIN ANDREWS VS MARRIOTT2
SNAKENBURG VS. HARTFORD CAS.....2

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

TARANIKA SUBRINA WEBB
TARANIKA S. WEBB
POST OFFICE
Post Office Box 13133
ANDERSON, SOUTH CAROLINA
(864) 221-6366
PRO SE

Taranika S. Webb

P.O. Box 13133

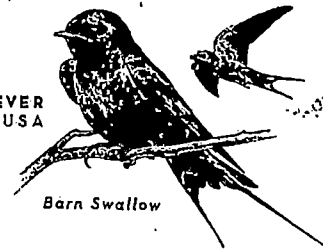
Anderson S.C. 29624

RECEIVED

SEP 06 2019

SC Court of Appeals

FOREVER
USA



S.C. Court of Appeals

Jenny Kitchings Clerk

P.O. Box 11629

Columbia, South Carolina 29211

TARANIKA WEBB
1922 Batts Lane Apt D
Clarksville TN 37042

TARANIKA WEBB
(864) 221-6366
APT D
1922 BATTS LN
CLARKSVILLE TN 37042

1 LBS 1 OF 1
SHP WT: 1 LBS
DWT: 15.12.14
DATE: 21 MAR 2022

SHIP SOUTH CAROLINA COURT OF APPEALS
TO: 1220 SENATE ST

COLUMBIA SC 29201-3769

SC 292 9-01

UPS 3 DAY SELECT 3
TRACKING #: 1Z X09 R07 39 3201 5376

BILLING: P/P
SIGNATURE REQUIRED

REF #2: NJ/ID

ISH 13.00F ZP 450 09.50 02/2022

SEE NOTICE ON REVERSE regarding UPS Terms, and notice of limitation of liability. Where allowed by law, shipper authorizes UPS to act as forwarding agent for export control and customs purposes. If exported from the US, shipper certifies that the commodities, technology or software were exported from the US in accordance with the Export Administration Regulations. Diversions contrary to law is prohibited.



South Carolina Court of Appeals
1220 Senate St.
Columbia SC 29201

SC COURT OF APPEALS
1220 SENATE ST
COLUMBIA SC 29201