

THE STATE OF SOUTH CAROLINA
in the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young
Charleston County
Trial Court Case No.: 2010-CP-26-9158

69445

APPELLATE CASE NO.: 2013-000279

Johnson Koola, Appellant,

vs.

Cambridge Two, LLC, Albert V. Estee, Individually, Cambridge Lakes, LP,
Stephen R. Heape, Individually and as General Partner of Cambridge Lakes, LP,
Cambridge Lakes Apartment Homes, a/k/a Cambridge Lakes Apartments, LP,
a/k/a Cambridge Lakes Apartment Homes, LP, Classic Properties of Charleston, Inc.,
Cambridge Contracting, LP, Trademark Properties, Inc., Carolina One Charleston
Home Team Properties, LLC, Charleston Home Team, LLC Carolina One, and
William E. Jenkinson, IV, Individually Respondents.

MOTION FOR EXTENSION
BY RESPONDENTS

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Respondents,
Cambridge Two, LLC, Albert Estee, Classic Properties of Charleston, Inc., Cambridge Lakes, LP
and Stephen R. Heape, respectfully request a thirty (30) day extension of the deadline for filing and
serving the Initial Brief and Designation of Matter to Be Included in the Record on Appeal in this
case. The current deadline is August 19, 2013. This is the second request for an extension of the

RECEIVED
AUG 16 2013
SC Court of Appeals

2nd
8/19/13

deadline. The Respondents respectfully request that the briefing scheduling be held in abeyance until this Motion can be heard and ruled on.

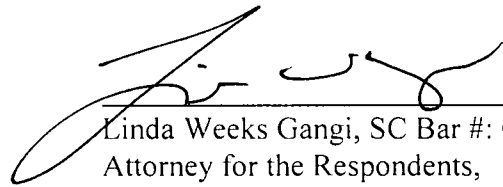
David J. Parrish attorney for the Respondents Cambridge Two, LLC and Albert Estee was not copied on the Order granting the extension of time to file the Respondents' Initial Brief and Designation of Matter and; thus was unaware of the deadline. Further, the undersigned attorneys for all of the respondents intend to file one brief on behalf of all Respondents.

Respectfully submitted,

THOMPSON & HENRY, P.A.

Conway, South Carolina

August 15, 2013.




Linda Weeks Gangi, SC Bar #: 002365
Attorney for the Respondents,
Classic Properties of Charleston, Inc.,
Cambridge Lakes, LP and Stephen R. Heape
Post Office Box 1740
Conway, South Carolina 29528-1740
Telephone No: (843) 248-5741
Fax No.: (843) 248-5112
lgangi@thompsonlaw.com

Nexsen Pruet, LLC

Charleston, South Carolina

August 15, 2013.



David J. Parrish
Attorney for Respondents Cambridge Two,
LLC and Albert V. Estee
Post Office Box 486
Charleston, SC 29402
Attorney for Respondents Cambridge Two,
LLC and Albert V. Estee
Telephone No: (843) 720-1771
Fax No: (843) 720-1777
dparrish@nexsenpruet.com

**THE STATE OF SOUTH CAROLINA
in the Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

**The Honorable W. Jeffrey Young
Charleston County
Trial Court Case No.: 2010-CP-26-9158**

APPELLATE CASE NO.: 2013-000279

Johnson Koola, Appellant,

vs.

Cambridge Two, LLC, Albert V. Estee, Individually, Cambridge Lakes, LP,
Stephen R. Heape, Individually and as General Partner of Cambridge Lakes, LP,
Cambridge Lakes Apartment Homes, a/k/a Cambridge Lakes Apartments, LP,
a/k/a Cambridge Lakes Apartment Homes, LP, Classic Properties of Charleston, Inc.,
Cambridge Contracting, LP, Trademark Properties, Inc., Carolina One Charleston
Home Team Properties, LLC, Charleston Home Team, LLC Carolina One, and
William E. Jenkinson, IV, Individually Respondents.

CERTIFICATE OF MAILING

I certify that I have served the Motion for Extension by Respondents and Certificate of Mailing by depositing one (1) copy in the United States Mail on August 15, 2013, to the undersigned at his/her/their address of record, with sufficient postage attached thereto as follows:

RECEIVED
AUG 16 2013
SC Court of Appeals

William B. Jung, Esq.
Bowman Center
1156 Bowman Road, Suite 100D
Mount Pleasant, SC 29464
Attorney for the Appellant

David J. Parrish, Esq.
Nexsen Pruet, LLC
Post Office Box 486
Charleston, SC 29402
Attorney for Respondents Cambridge Two,
LLC and Albert V. Estee

A handwritten signature in cursive script, appearing to read "Ann Shearin", written over a horizontal line.

Ann Shearin
Assistant to Linda Weeks Gangi

THOMPSON & HENRY, P.A.
ATTORNEYS AT LAW
1300 SECOND AVENUE, THIRD FLOOR (29526)
POST OFFICE BOX 1740
CONWAY, SOUTH CAROLINA 29528

LINDA WEEKS GANGI
lgangi@thompsonlaw.com

TELEPHONE
(843) 248-5741
FAX
(843) 248-5112

August 15, 2013

William B. Jung, Esq.
Bowman Center
1156 Bowman Road, Suite 100D
Mount Pleasant, SC 29464

David J. Parrish, Esq.
Nexsen Pruet, LLC
Post Office Box 486
Charleston, SC 29402

Re: *Johnson Koola vs. Cambridge Two, LLC, Albert v. Estee, Individually, Cambridge Lakes, LP, Stephen R. Heape, et al.*
Appellate Case No.: 2013-000279

Counselors:

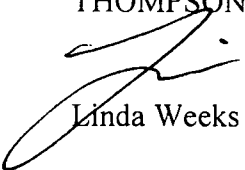
Please find enclosed herewith the copies of the following documents with regard to the above-referenced action:

- a. Motion for Extension by Respondents; and
- b. Certificate of Mailing.

With kindest personal regards, I remain

Yours very truly,

THOMPSON & HENRY, P.A.


Linda Weeks Gangi

LWG/avs

Enclosures

pc: The Honorable Jenny Abbott Kitchings
Ms. Sharon Eason - sharon.eason.cr9g@statefarm.com

RECEIVED

AUG 16 2013

SC Court of Appeals

THOMPSON & HENRY, P.A.
ATTORNEYS AT LAW
1300 SECOND AVENUE, THIRD FLOOR (29526)
POST OFFICE BOX 1740
CONWAY, SOUTH CAROLINA 29528

LINDA WEEKS GANGI
lgangi@thompsonlaw.com

TELEPHONE
(843) 248-5741
FAX
(843) 248-5112

August 15, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: *Johnson Koola vs. Cambridge Two, LLC, Albert v. Estee, Individually, Cambridge Lakes, LP, Stephen R. Heape, et al.*
Appellate Case No.: 2013-000279

Dear Ms. Kitchings:

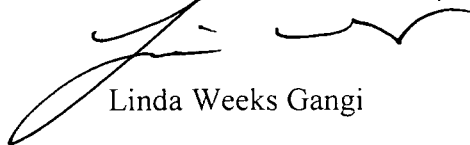
Please find enclosed the original and seven (7) copies of the Motion for Extension by Respondents and Certificate of Mailing with regard to the above-referenced action. Please file the originals, clock the copies and return clocked copies of the Motion and Certificate of Mailing to me in the enclosed self-addressed stamped envelope.

I have also enclosed a check in the amount of \$25 for the cost of filing this Motion.

With kindest personal regards, I remain

Yours very truly,

THOMPSON & HENRY, P.A.



Linda Weeks Gangi

LWG/avs
Enclosures

pc: William B. Jung, Esq. - bradjung@msn.com
David J. Parrish, Esq. - dparrish@nexsenpruet.com
Ms. Sharon Eason - sharon.eason.cr9g@statefarm.com

RECEIVED
AUG 16 2013
SC Court of Appeals