

**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, Plaintiff/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

of Whom Cambridge Two, LLC, Albert V. Estee, Cambridge Lakes, LP
a/k/a Cambridge Lakes Apartment Homes, a/k/a Cambridge Lakes Apartments, LP, a/k/a
Cambridge Lakes Apartments Homes, LP, Stephen R. Heape, and Classic Properties of
Charleston, Inc. are Respondents.

**RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

The Respondents propose the following to be included in the Record on Appeal:

1. Summons and Complaint
2. Affidavits of Service of the Summons and Complaint upon Respondents

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SC Court of Appeals

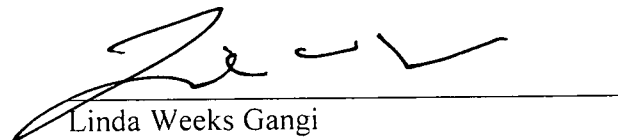
3. January 27, 2012 Motion to Dismiss by Albert Estee and Cambridge II, LP
4. February 3, 2012 Motion to Dismiss by Stephen R. Heape, Cambridge Lakes, LP and Classic Properties of Charleston, Inc.
5. Transcript of the July 25, 2013 hearing
6. August 1, 2013 Submission by Appellant
7. September 4, 2013 Order of the Honorable W. Jeffrey Young filed on September 19, 2013
8. September 28, 2013 Motion of Appellant for Amendment and Reconsideration of Order Granting Summary Judgment
9. January 28, 2013 Notice Denying Appellant's Motion for Reconsideration
10. Appellant's Responses to Interrogatories filed in the case of BAC Home Loan Servicing, LP v. Johnson V. Koola, et al., Case No.: 2010-CP-10-6060 including Exhibit to Koola's Answers to Interrogatories
11. Complaint in Case No.: 2008-CP-10-3506, *Cambridge Lakes Condominium HOA vs. Bostic Brothers Construction, Inc., et al.*

We certify in accordance with Rule 209 of the South Carolina Appellate Court Rules that this Designation contains no matters irrelevant to this appeal.

Conway, South Carolina

THOMPSON & HENRY, P.A.

September 18, 2013



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Post Office Box 1740
Conway, South Carolina 29528-1740
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Attorney for Cambridge Lakes, LP and
Stephen R. Heape, Classic Properties of
Charleston, Inc.

Charleston, South Carolina

NEXSEN PRUETT, LLC

David J. Parrish

David J. Parrish

by WLG

Post Office Box 486

Charleston, SC 29402

Attorney for Respondents Cambridge Two,
LLC and Albert V. Estee

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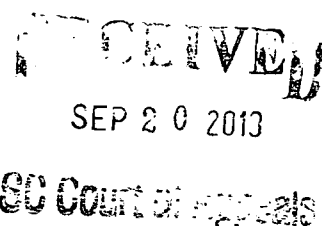
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Cambridge Lakes Apartments Homes, LP, Stephen R. Heape, and Classic Properties of
Charleston, Inc. are Respondents.

CERTIFICATE OF MAILING

I, Ann Shearin, am an employee for the law firm of Thompson & Henry, P.A., attorney for the Respondents in the above-captioned action, certify that I have this 18th day of September, 2013 mailed a copy of the following documents:

- a. Respondents' Initial Brief;



- b. Respondents' Designation of Matter to be Included in the Transcript of Record; and
- c. Certificate of Mailing.

to the undersigned at their
address of record, with sufficient postage attached thereto as follows:

William B. Jung, Esq.
Bowman Center
1156 Bowman Road, Suite 100D
Mount Pleasant, SC 29464
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September 18, 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 herewith the unbound original and one (1) copy of the following documents with regard to the above-referenced action:

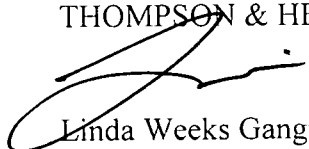
- a. Respondents' Initial Brief;
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- c. Certificate of Mailing.

Please file the originals, clock the copies and return a clocked copy of each to me in the enclosed self-addressed stamped envelope.

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

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