

EXHIBIT B

CORRIGAN & CHANDLER LLC

ATTORNEYS AT LAW

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REPLY TO:
P.O. Box 547
Charleston, SC 29402

December 23, 2013

VIA US MAIL

Mr. Johnson Koola
1587 Cambridge Lakes Drive
Mt. Pleasant, SC 29464

Re: *Cambridge Lakes HOA v. Johnson Koola*
Case No. 2010-CP-10-9305 / Appellate Case No. 2013-001632
Our File No. C1001.M0142

Dear Mr. Koola:

I am responding to Appellant's Initial Brief and Designation of Matter in connection with the appeal of the above-referenced case. A few of the items listed on the Designation of Matter are not described with enough specificity to identify and/or to determine whether they are properly included in the Record on Appeal. I write in an attempt to resolve this matter without having to file a motion or objections.

As you know, Rule 209(a) and (b), SCACR, require that the materials included in the Designation of Matter be set forth with "specificity" and that the Designation "clearly identify" what the party desires to have included. Rule 209(b) also incorporates the content requirements of Rule 210(c), which provides that the record shall not include matter which was not presented to the lower court.

Certain items are unclear as to what documents Appellant is referring to. As presented, these records have not been submitted to the lower court, and should not be included in Appellant's Designation of Matter. Please submit more specific descriptions and demonstrate where these documents are located in the court's record. Then I will be able to confirm these documents are in compliance with the South Carolina Appellate Court Rules. The following materials require clarification:

ROA #2: *Master of the HOA at p.1*

ROA #5: *Summons, Aug. 10, 201*

ROA #6: *Summons on Crossclaim of HOA, Dec. 15, 2010*

ROA #7: *President's Report 2011 at 3*

ROA #8: *Koola Counterclaim, Nov. 5, 2010*

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ROA #9: *Koola, Answer and Counterclaim, Case No: 2010-CP-10-6060,
March 3, 2011*

ROA # 21: *Minutes of the meetings of the BOA¹ May 2008 and June 2008*

ROA #22: *Notice of Condominium Conversion and Offer to Purchase*

ROA #23: *Cambridge Lakes HOA Annual Budgets 2007, 2009, 2010, 2011 and
2013*

ROA #24: *Certificate of Insurance*

If your records indicate something to the contrary, please let me know. If not, please tell me by December 30, 2013 whether Appellant will submit an Amended Designation of Matter addressing these issues, and if necessary, an Amended Appellant Brief.

With best regards, I am

Yours very truly,



Eugene P. Corrigan III

cc: Lydia P. Brooks, Esquire

¹ Respondent does not object to the April 2008 meeting minutes that are also listed as part of ROA #21 in Appellant's Designation of Matter