

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

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

The Honorable R. Markley Dennis, Jr., Circuit Court Judge
Circuit Court Case No. 2010-CP-10-9305

APPELLATE CASE NO.: 2013-001632

Cambridge Lakes HOA,.....Respondent,

v.

Johnson Koola,.....Appellant.

APPELLANT'S REPLY

TO RESPONDENT'S MOTION FOR [SECOND] EXTENSION OF TIME

Appellant pro se Johnson Koola hereby replies to Respondent Cambridge Lakes HOA's Motion for [second] Extension of Time to file Respondent's Initial Brief and Designation of Matter as follows:

Respondent is represented by two law firms, Corrigan & Chandler, LLC and Krawcheck and Davidson, LLC. Appellant represents himself as pro se.

Appellant filed the Notice of Appeal on July 17, 2013 and received a thirty days' extension of time to file the Initial Brief. Appellant filed the Initial Brief and 'Designation of Matter' on September 16, 2013.

On September 19, 2013, Respondent filed a 'Motion to Dismiss' Appellant's appeal stating that the appeal is interlocutory. On September 28, 2013, Appellant filed the 'Return to the Motion to Dismiss' the appeal. On Oct. 3, 2013, Respondent filed a reply to Appellant's Return in which it stated among others "*The Appellant has made clear to counsel that he intends to use every means possible, including appeals, to delay this matter.*" (Emphasis added). On Oct. 12, 2103 Appellant filed a response to Respondent's Reply stating that Respondent has not substantiated its new allegations against Appellant. On Oct. 17, 2013, Respondent through a letter addressed to the Clerk of the Court objected to Appellant's response dated Oct. 12, 2013.

On December 4, 2013, the Court of Appeals denied Respondent's Motion to Dismiss' Appellant's appeal and ordered Respondent to file its Initial Brief within thirty days. On Dec. 11, 2013, Respondent requested and received an extension of thirty days' time to February 3, 2013 to file its Initial Brief and Designation of Matter.

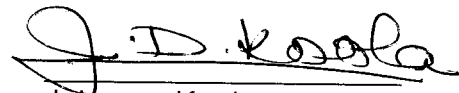
On Jan. 24, 2014, instead of filing the Initial Brief, Respondent filed a 'Motion to Strike' certain materials from Appellant's 'Designation of Matter'. On April 9, 2014 the Court of Appeals granted Respondent's 'Motion to Strike' and ordered Appellant to file an amended Initial Brief within twenty days.

On April 28, 2014, Appellant filed the amended Initial Brief and 'Designation of Matter'. Respondent's Initial Brief was due on May 29, 2014. However, on May 28, 2014, Respondent filed a Motion for a *second extension of thirty days' time* to file its Initial Brief. Respondent states that one of Respondent's research staff resigned with two days' of notice! It is not the Appellant but the Respondent, which has filed motion

after motion to delay the timeline in which the Respondent is obligated to file Respondent's Brief.

For such reasons, Appellant objects to Respondent's Motion for [Second] Extension of Time. If this Court is inclined to grant the said Motion, Respondent will be required to file its Initial Brief by June 27, 2017, and Appellant will be required to file the Reply Brief by July 7, 2010. Plaintiff will be severely prejudiced in his ability to file his Reply Brief by July 7, 2014. From June 25 through July 1, 2014 Plaintiff will be overseas to attend his daughter's marriage. If the Court of Appeals grants Respondent a second extension of thirty days' time, Appellant requests the Honorable Court to grant him an extension of ten days' time to July 17, 2014 to file his Reply Brief and 'Designation of Matter'.

Respectfully submitted,



Johnson Koola
1587 Cambridge Lakes Dr
Mt. Pleasant, SC 29464
(843) 849-9241

Appellant pro se

May 31, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr., Circuit Court Judge
Circuit Court Case No. 2010-CP-10-9305

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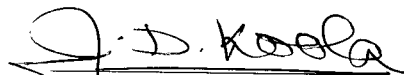
PROOF OF SERVICE

I, Johnson Koola, under penalty of perjury, certify that on May 31, 2014, I served a copy of Plaintiff's Reply to Respondent's Motion for [Second] Extension of Time by mailing a true copy of the same to the following counsels of record for the Respondent:

Eugene P. Corrigan III, Esq.
Corrigan & Chandler, LLC
16, Charlotte St., St. B
Charleston, SC 29403

Lydia P. Brooks, Esq.
Krawcheck and Davidson, LLC
9 State Street
Charleston, SC 29401

Dated: Mt. Pleasant, SC
May 31, 2014



Johnson Koola
1587 Cambridge Lakes Dr
Mt. Pleasant, S.C. 29464
(843) 849-9241

Appellant pro se

JOHNSON D KOOLA
1587 Cambridge Lakes Dr
Mt. Pleasant, SC 29464
Phone: (843) 849-9241

May 31, 2014

The Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, S.C. 29201

Re: Cambridge Lakes HOA v. Johnson Koola
Appeal Case No.: 2013-001632

Sub: APPELLANT'S REPLY TO RESPONDENT'S MOTION FOR
[SECOND] EXTENSION OF TIME

Dear Honorable Kitchings:

I am the appellant pro se in the above appeal, Cambridge Lakes HOA v. Johnson Koola, Appeal case No.: 2013-001632.

I am writing to file Appellant's Reply to Respondent's Motion for [Second] Extension of Time to file Respondent's Initial Brief and Designation of Matter (seven copies). Certificate of Service is attached to copy of each document. I am serving a copy of this letter and enclosures to the consuls on record for the respondent.

I thank you in advance for your kind efforts to accept the appellant's Reply on the subject matter.

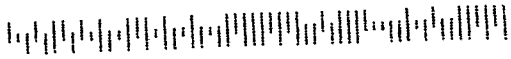
Sincerely yours,


Johnson Koola

CC: Eugene P. Corrigan III, Esq.
Corrigan & Chandler, LLC

Lydia P. Brooks, Esq.
Krawcheck and Davidson, LLC

Mr. Johnso
1587 Cambridge Lakes Dr
Mount Pleasant, SC 29464



(420) 29201



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THE CLERK OF COURT

SOUTH CAROLINA COURT OF APPEALS

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SC Court of Appeals