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DEC 22 2014
SC Court of Appeals

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(803) 252-5817
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December 19, 2014

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

RE: **Bank of America, N.A. vs. Johnson D. Koola, et al.**
Case No.: 2014-001323
Our File No.: F10-04188

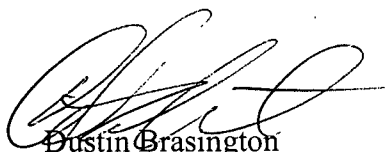
Dear Sir or Madam:

Enclosed please find an original and six (6) copies of the Respondent's Return to Appellant's Motion to Compel the Respondent to Serve Respondent's Brief on the Appellant and Proof of Service in the above-referenced matter. Please file same and return one copy to me marked "filed" in the self-addressed, stamped envelope provided.

By copy of this letter, I am hereby serving the appellant with a copy of the above documents.

If you have any questions or should need anything further, please do not hesitate to contact me.

Sincerely,


Dustin Brasington
Litigation Paralegal

Enc. (as stated)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity

The Honorable Mikell Scarborough

Appellate Case No. 2014-001323

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Bank of America, N.A.,

Respondent,

v.

Johnson D. Koola, First Citizens Bank and Trust Company, Inc.,
f/k/a First Citizens Bank and Trust Company of South Carolina,
and Cambridge Lakes Condominium Homeowners Association, Inc.,
f/k/a Cambridge Lakes Horizontal Property Regime,
Defendants,

Of whom Johnson D. Koola is the

Appellant.

**RESPONDENT'S RETURN TO APPELLANT'S MOTION TO COMPEL THE
RESPONDENT TO SERVE RESPONDENT'S BRIEF ON THE APPELLANT**

Robert P. Jackman, SC Bar No. 78755
Korn Law Firm, P.A.
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(803) 252-5817
Attorney for Respondent

Johnson D. Koola
1587 Cambridge Lakes Drive
Mt. Pleasant, SC 29464
Pro Se Appellant

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PURSUANT TO RULE 240(E), SCACR, THE RESPONDENT HEREBY FILES ITS RETURN TO APPELLANT'S MOTION TO COMPEL THE RESPONDENT TO SERVE RESPONDENT'S BRIEF ON THE APPELLANT, AVERRING AS FOLLOWS:

1. Respondent filed its initial brief in this matter with the Clerk of Court for the South Carolina Court of Appeals on November 14, 2014.

2. Along with its initial brief, Respondent filed a proof of service certifying that a copy of its initial brief was served on Appellant by depositing the same into the United States Mail on November 14, 2014 addressed to Appellant at 462 Common Wealth Road, Mt. Pleasant, South Carolina 29644.

3. On December 18, 2014, Respondent received a copy of Appellant's Motion to Compel Respondent to Serve Respondent's Brief on the Appellant and Motion to Sanction the Respondent.

4. Appellant's motion states that Appellant has not yet received a copy of Respondent's initial brief and seeks an order compelling Respondent to serve its initial brief on Appellant.

5. Upon review of the file by Respondent's counsel, it was discovered that Respondent inadvertently listed an incorrect address for Appellant, therefore identifying why Appellant had not received Respondent's initial brief.

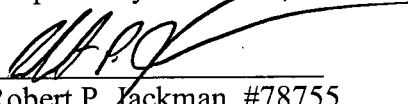
6. This scrivener's error by Respondent was a result of Respondent's counsel failing to change the address for Appellant on a brief Respondent had filed in a separate matter that was used as a template by Respondent's counsel for the purpose of formatting and ensuring compliance with Rule 267, SCACR.

7. Concurrent with the submission of this return, Respondent is hereby serving on Appellant a copy of its initial brief filed on November 14, 2014 at Appellant's correct address of 1587 Cambridge Lakes Drive, Mt. Pleasant, South Carolina 29464.

8. Respondent is also filing an amended proof of service for its initial brief with the Clerk of Court for the South Carolina Court of Appeals.

For the reasons stated, Respondent respectfully requests that this Court render moot the Appellant's Motion to Compel the Respondent to Serve Respondent's Brief on the Appellant and issue an order requiring the Record on Appeal to be filed and served by Appellant within thirty (30) days of the date of Respondent's amended service of its initial brief on Appellant pursuant to Rule 210(a), SCACR.

Respectfully submitted,


Robert P. Jackman, #78755
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Bob.Jackman@kornlawfirm.com
Attorney for Respondent

December 19, 2014

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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The Honorable Mikell Scarborough

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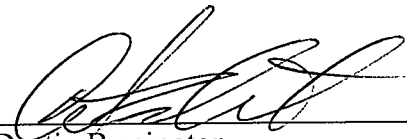
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Defendants,

Of whom Johnson D. Koola is the

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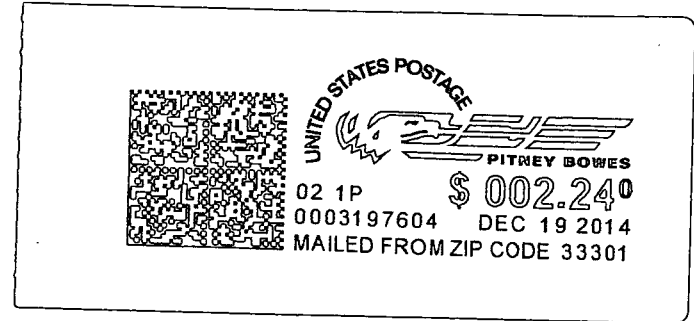
PROOF OF SERVICE

I, Dustin Brasington, certify that I have served a copy of Respondent's Return to Appellant's Motion to Compel the Respondent to Serve Respondent's Brief on the Appellant on Appellant Johnson D. Koola by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2014 addressed to Appellant at 1587 Cambridge Lakes Drive, Mt. Pleasant, South Carolina 29464.


Dustin Brasington
Paralegal to Robert P. Jackman

December 19, 2014.

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DAB

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