

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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FEB 04 2015

SC Court of Appeals

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 MOTION REQUESTING PERMISSION TO SERVE AND
FILE AN AMENDED DESIGNATION OF MATTER**

ROBERT P. JACKMAN, SC BAR NO. 78755
Korn Law Firm, P.A.
1300 Pickens Street
Post Office Box 12369
Columbia, SC 29211-2359
(803) 252-5817
Attorney for Respondent

Johnson D. Koola
462 Common Wealth Road
Mt. Pleasant, SC 29644
Pro Se Appellant

Other Counsel of Record:

Dean A. Hayes, Esq.
Korn Law Firm, P.A.
1300 Pickens Street
Post Office Box 12369
Columbia, SC 29211-2359
(803) 252-5817

John Sanford Kay, Esquire
Hutchens Law Firm
Post Office Box 8237
Columbia, SC 29202
(803) 726-2700

S. Nelson Weston, Jr., Esq.
Richardson Plowden & Robinson PA
1900 Barnwell Street
Columbia, SC 29201
(803) 771-4400


Eugene P. Corrigan, III, Esq.
Corrigan & Chandler, LLC
Post Office Box 547
Charleston, SC 29402
(843) 577-5450

MEMORANDUM IN SUPPORT OF MOTION TO REQUEST PERMISSION TO FILE
AN AMENDED DESIGNATION OF MATTER ON APPEAL

The respondent, Bank of America, N.A. moves to request permission to file an amended designation of matter on appeal. This motion is being made in order to ensure compliance with South Carolina Appellate Court Rules 209 and 210. It is also being made with the consent of the Appellant. Respondent has included a copy of the proposed amended designation of matter on appeal and a proof of service.

Wherefore, Bank of America respectfully requests that the Court grant respondent permission to file an amended designation of matter on appeal.

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Robert P. Jackman, SC Bar No. 78755
Korn Law Firm, P.A.
1300 Pickens Street
Post Office Box 12369
Columbia, SC 29211-2359
(803) 252-5817
Attorney for Respondent

January 30, 2015

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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SC Court of Appeals

Bank of America, N.A.,

Respondent,

v.

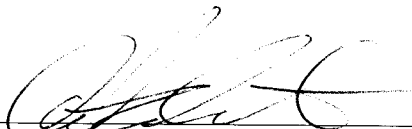
Johnson D. Koola, First Citizens Bank and Trust Company, Inc.,
f/k/a First Citizens Bank and Trust Company of South Carolina, and
Cambridge Lakes Condominium Homeowners Association, Inc.,
f/k/a Cambridge Lakes Horizontal Property Regime,
Defendants,

Of whom Johnson D. Koola is the

Appellant.

PROOF OF SERVICE

I, Dustin Brasington, certify that I have served a copy of Respondent's Motion Requesting Permission to Serve and File an Amended Designation of Matter and Respondent's Proposed Amended Designation of Matter for Record on Appeal on Appellant Johnson D. Koola by depositing a copy of it in the United States Mail, postage prepaid, on February 2, 2015 addressed to Appellant at 1587 Cambridge Lakes Drive, Mt. Pleasant, South Carolina 29464.


Dustin Brasington
Paralegal to Robert P. Jackman

February 2, 2015.

KORN LAW FIRM, P.A.
ATTORNEYS AND COUNSELORS AT LAW
1300 PICKENS STREET
COLUMBIA, SOUTH CAROLINA 29201

MAILING ADDRESS
POST OFFICE BOX 12369
COLUMBIA, SOUTH CAROLINA 29211-2369
(803) 252-5817
FACSIMILE (803) 231-2060

February 4, 2015

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

M4942

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SC Court of Appeals

RE: **Bank of America, N.A. vs. Johnson D. Koola, et al.**

Case No.: 2014-001323

Our File No.: F10-04188

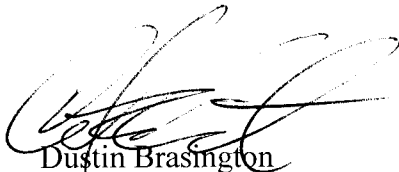
Dear Sir or Madam:

Enclosed please find an original and seven copies of the Respondent's Motion Requesting Permission to Serve and File an Amended Designation of Matter and Respondent's Proposed Amended Proof of Service on Appellant of its Initial Brief and Designation of Matter for Record on Appeal 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)