

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APR 6 2015

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

S.C. Supreme Court

The Honorable W. Jeffrey Young, Circuit Court Judge

APPELLATE CASE No.: 2015-000399

Johnson Koola,.....Petitioner,

v.

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 Lake 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, Individually, Cambridge Lakes, LP, Stephen R. Heape, Individually and as General Partner of Cambridge Lakes, LP are theRespondents.

**PETITIONER’S MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO RETURN**

Petitioner moves this Court for an extension of time by five days to file the Reply to the Return.

On February 24, 2015, petitioner filed and served a Writ of Certiorari. The Return to the Petition was expected on March 26 or 27, but petitioner actually received the Return on April 1, 2015 through mail after the ninth day of service. Certificate of Service states that the Return was mailed on March 24. The office of the counsel for the respondent franked the mailing envelope on March 24, 2015 and not the post office. The post office advised petitioner that an instate letter

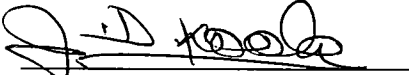
should not take nine days for delivery and suggested that the mail though franked on March 24, was not deposited in the mail box on March 24 as the most probable cause for delayed delivery.

Petitioner had just twenty-eight hours to file the Reply on April 2 after receipt of the Return. Petitioner pro se could not file a meaningful and acceptable Reply in just twenty-eight hours. Also, the petitioner pro se uses public library for legal research, and the legal research could not be completed in twenty-eight hours.

Petitioner moves this Court for an extension of time by just five days to file the Reply latest by April 7, 2015.

Respectfully submitted,

Dated: April 3, 2015



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

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

APPELLATE CASE No.: 2015-000399

Johnson Koola,.....Petitioner,

v.

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 Lake 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, Individually, Cambridge Lakes, LP, Stephen R. Heape, Individually and as General Partner of Cambridge Lakes, LP are theRespondents.

CERTIFICATE OF SERVICE

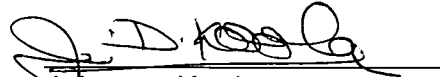
I, Johnson Koola, under penalty of perjury, certify that on April 3, 2015, I served a copy of the petitioner's Motion for Extension of Time to file Reply to Return by mailing a copy of the same through U.S. mail, first class postage affixed, to the following counsels of record for the respondents:

David J. Parish, Esq.
Nexsen Pruet, LLC
P.O. Box 486
Charleston, S.C. 29402
(843) 720-1771
Attorney for Respondents
Cambridge Two, LLC and
Albert Estee

Linda Weeks Gangi, Esq.
Thompson & Henry, P.A.
P.O. Box 1740
Conway, S.C. 29528-1740
(843) 248-5741
Attorney for Respondents
Cambridge Lakes, LP and
Stephen R. Heape

Signature follows

Dated: April 3, 2015



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

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

April 3, 2015

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RECEIVED

APR 6 2015

Re.: Appellate Case No. 2015-000399
Sub.: Reply to the Return

S.C. Supreme Court

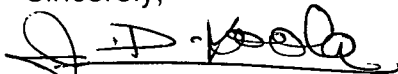
Dear Honorable Mr. Shearouse,

I am the petitioner pro se in the above Petition. On February 24, 2015, petitioner filed and served a Writ of Certiorari. The Return to the Petition was expected on March 26 or 27, but petitioner actually received the Return on April 1, 2015 through mail after the ninth day of service. Certificate of Service states that the Return was mailed on March 24. The office of the counsel for the respondent franked the mailing envelope on March 24, 2015 and not the post office. The post office advised petitioner that an instate letter should not take nine days for delivery and suggested that the mail though franked on March 24, was not deposited in the mail box on March 24 as the most probable cause for delayed delivery. Petitioner suspects foul play and requests your office to determine the causes for the delayed delivery. Please advise me whether petitioner should file a Motion for this purpose.

Petitioner had just twenty-eight hours to file the Reply on April 2 after receipt of the Return. Petitioner pro se could not file a meaningful and acceptable Reply in just twenty-eight hours. Also, the petitioner pro se uses public library for legal research, and the legal research could not be completed in twenty-eight hours.

Enclosed please find seven copies of a Motion for Extension of Time by just five days and to be filed on April 7, 2015 and check for \$25.

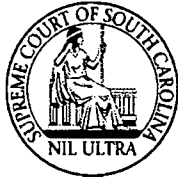
Sincerely,



Johnson Koola

Copy to:
David J. Parish, Esq.
Attorney for Respondents
Cambridge Two, LLC and
Albert Estee

Linda Weeks Gangi, Esq.
Attorney for Respondents
Cambridge Lakes, LP and
Stephen R. Heape



The Supreme Court of South Carolina

Johnson Koola
1587 Cambridge Lake Drive
Mt. Pleasant SC 29464

04/06/2015

RECEIPT #75594

Case No: 2015-000399
Case Short Title: Johnson Koola v. Cambridge Two
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 1132
Check/Money Order Date: 04/03/2015
Comments: