

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Common Pleas Case No. 2010-CP-10-9158

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APPELLATE CASE NO. 2015-000111

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**RECEIVED**  
MAY 05 2015  
SC Court of Appeals

Johnson Koola, *Pro se*,

Appellant,

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 Lakes 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 Trademark Properties, Inc., and Carolina One Real Estate are the Respondents.

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**RESPONDENT TRADEMARK'S DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL**

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R. MICHAEL ETHRIDGE  
SUZANNE E. HOGG  
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40 Calhoun Street, Suite 400  
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(843) 727-0307

Attorneys for Respondent Trademark  
Properties, Inc.

To the extent the following matters have not been identified by the Appellant in his Designation of Matter, Respondent Trademark Properties, Inc. proposes the following additional matters be included in the Record on Appeal:

1. Complaint against Trademark Properties, Inc. dated November 4, 2010;
2. Trademark Properties, Inc.'s Motion for Summary Judgment dated December 5, 2013;
3. Affidavit of Richard Davis dated December 3, 2013;
4. Affidavit of Richard Davis, filed November 2, 2010;
5. Memorandum of Law in Support of Defendant Trademark Properties, Inc.'s Motion for Summary Judgment dated December 5, 2013;
6. Defendant Trademark Properties, Inc.'s Supplemental Memorandum of Law in Support of Its Motion for Summary Judgment dated October 21, 2014;
7. Order Granting Summary Judgment to Defendant Trademark Properties, Inc. dated November 3, 2014;
8. Form 4 Order Granting Summary Judgment to Defendant Trademark Properties, Inc. issued October 28, 2014;
9. Notice of Motion and Motion for Amendment and Reconsideration of the Order Granting Summary Judgment to Defendant Trademark Properties, Inc. dated November 12, 2014;
10. Memorandum of Evidentiary Exhibits in Support of Motion for Amendment and Reconsideration of the Order Granting Summary Judgment to Defendant Trademark Properties, Inc. dated November 13, 2014;
11. Order Denying Motion to Reconsider dated December 1, 2014;
12. MLS Report, dated April 7, 2014, bates labeled Trademark 0003;
13. Consent to Dual Agency between Carolina One and Johnson Koola, dated January 24, 2004;
14. Agreement to Buy and Sell Real Estate between Johnson Koola and Cambridge Two, LLC, dated January 24, 2004;
15. Buyer Representation Agreement between Carolina One and Johnson Koola, dated January 24, 2004;

16. Trademark Properties Exclusive Right to Sell Listing Agreement for Residential Multiple Listing between Cambridge Two, LLC and Trademark Properties, dated August 9, 2002;
17. **(Full Copy, all pages)** Master Deed for Cambridge Lake Horizontal Property Regime, dated February 24, 2003; and
18. **(Full Copy, all pages)** Transcript of Deposition of Richard Davis, dated September 9, 2010;
19. **(Full Copy, all pages)** Transcript of the October 22, 2014 Hearing on Trademark's Motion for Summary Judgment.

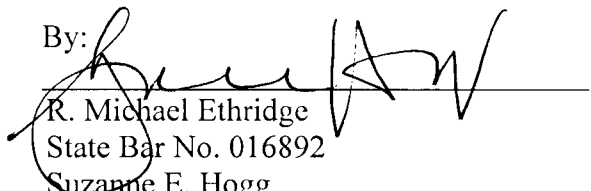
I certify that this designation contains no matter which is irrelevant to this appeal.

This 1st day of May, 2015.

Respectfully submitted,

CARLOCK COPELAND & STAIR, LLP

By:



R. Michael Ethridge  
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May 1, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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MAY 05 2015  
SC Court of Appeals

Re: Johnson Koola v. Trademark Properties, Inc.  
Appellate No.: 2015-000111  
CCS File No.: 2183-48478

Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of the following:

1. Initial Brief of Respondent Trademark Properties, Inc.; and
2. Respondent Trademark's Designation of Matter to be Included in Record on Appeal.

Please file the originals and return file-stamped copies to our office in the enclosed self-addressed, stamped envelope.

Should you have any questions or concerns, please do not hesitate to call me.

With kindest regards, I remain,

Sincerely yours,

  
SUZANNE E. HOGG

SEH/kjg  
Enclosures

cc: Johnson D. Koola  
Michael Scarafilo, Esquire  
Linda Gangi, Esquire  
David J. Parrish, Esquire



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