

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 08 2015

APPEAL FROM CHARLESTON COUNTY SC Court of Appeals
Court of Common Pleas

The Honorable R. Markley Dennis, Jr., Circuit Judge

Case No.: 2010-CP-10-9158

Johnson Koola

Appellant

v.

Cambridge Two, LLC, Albert V. Estes, 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 Apartment Homes, LP, Classic
Properties of Charleston, Inc., Cambridge
Contracting, LP, Trademark Properties, Inc.,
Carolina One Charleston Home Team Properties,
LLC, Charleston Homes Team, LLC, Carolina
One, and William E. Jenkinson, IV, individually

Of Whom

Trademark Properties, Inc. and Carolina One Are . . .

Respondents

**DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL
OF RESPONDENT CAROLINA ONE**

Respondent Carolina One proposes the following to be included in the Record on Appeal:

1. Complaint
2. Answer of Carolina One
3. Motion for Summary Judgment of Carolina One,
October 6, 2014
4. Motion for Summary Judgment and Reply of Johnson Koola,
October 13, 2014

5. Motion of Support and Opposition to Motion of Carolina One, October 21, 2014
6. Order Granting Summary Judgment, October 28, 2014
7. Motion to Reconsider and Memorandum in Support, November 12, 2014
8. Order, December 18, 2014

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

Respectfully submitted,



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(843) 552-2678 facsimile
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Attorney for Respondent Carolina One


Other Counsel of Record:

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Carolina One Real Estate
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North Charleston, SC 29405
(843) 202-2061
(843) 202-3061 facsimile
Legal@carolinaone.com

6/5, 2015
North Charleston, SC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Initial Brief and Designation of Matter to Be Included in Record on Appeal of Respondent Carolina One was served upon all parties via hand delivery or United States mail this ____ day of June, 2015.



David A. Collins

6/5, 2015
Charleston, SC

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SC Court of Appeals

**LAW OFFICE
OF
DAVID A. COLLINS, LLC**

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29423

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June 5, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

RE: Koola v. Cambridge Two, LLC et. al., Case No. 2010-CP-10-9158

Dear Ms. Kitchings,

Enclosed herewith please find an original and two copies of the following:

1. Initial Brief of Respondent Carolina One
2. Designation of Material to be Included in Record
3. Certificate of Service

Please file the documents and return a filed copy to me in the envelope provided. Should you have questions regarding this matter please do not hesitate to contact me.



David A. Collins, Esq.

CC/ R. Michael Ethridge, Esquire
Johnson Koola

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UNITED STATES US

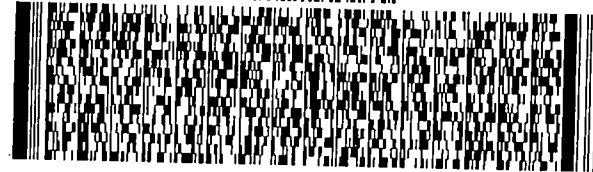
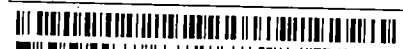
TO

SOUTH CAROLINA COURT OF APPEAL
1015 SUMTER ST

COLUMBIA SC 29201

(888) 888-8888
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Express



NEW Package
Express US Airbill

FedEx Tracking Number

8064 4021 8149

Form ID No. 0200

4 Express Package Service ** To most locations.
NOTE: Service order has changed. Please select carefully.

Next Business Day

2 or 3 B

- FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon.*
Saturday Delivery NOT available.

- FedEx 2 Second bu Saturday D
- FedEx 2 Second bu will be del Delivery is
- FedEx 2 Third busi Saturday I

5 Packaging *Declared value limit \$500.

- FedEx Envelope*
- FedEx Pak*
- Fedf Box*

6 Special Handling and Delivery Signature Opti

- SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day AM, or FedEx Express S

- Signature Required
Package may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- No
- Yes
As per attached Shipper's Declaration.
- Yes
Shipper's Declaration not required.

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

- Dry Ice
Dry ice, S, UN 1845 _____ x _____ kg
- Cargo Aircraft Only

7 Payment Bill to:

- Sender
Acct. No. in Section 1 will be billed.
- Recipient
- Third Party
- Credit Card
- Cash/Check

Total Packages Total Weight Credit Card Auth.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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David Collins Phone 813 224-3778

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Internal Billing Reference

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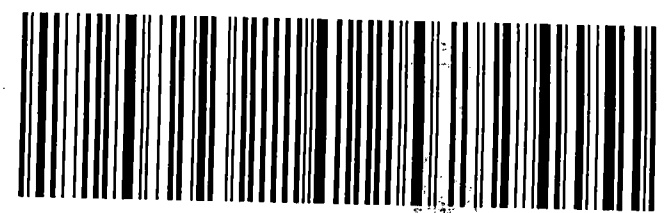
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