

5

76289

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

JUN 12 2015

SC Court of Appeals

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

Case No.: 2010-CP-10-9158

APPELLATE CASE No.: 2015-000111

Johnson Koola,.....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.

**MOTION REQUESTING PERMISSION TO ADD  
PINPOINT CITE TO SOUTH CAROLINA AUTHORITY IN CITATIONS**

Appellant pro se, Johnson Koola, moves this Court for permission to add pinpoint cite to South Carolina Authority in his Initial and Final Briefs.

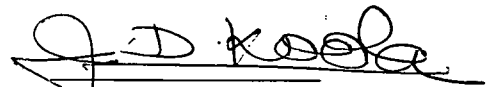
Rule 268, SCACR, does not require a party to add pinpoint cite to South Carolina Authority in briefs. However, published South Carolina Authorities usually include pinpoint cite in citations.

Appellant, being pro se, does not have access to online legal research and depends on public libraries for legal research. Due to timely non-availability of information, appellant could not add pinpoint cite to the citations of South Carolina Authorities in his Briefs.

Appellant requests the permission of the Court to add pinpoint cite to South Carolina Authority in his Initial and Final Briefs.

In anticipation of the Court's permission, appellant would be filing his Final and Final Reply Briefs on June 29, 2015 by adding pinpoint cite to citations of South Carolina Authority.

Respectfully submitted,



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

Appellant pro se

5

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED  
JUN 12 2015  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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

Case No.: 2010-CP-10-9158

APPELLATE CASE No.: 2015-000111

Johnson Koola,.....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.


PROOF OF SERVICE

I, Johnson Koola, certify that on June 10, 2015, I have served a copy of Motion Requesting Permission to Add Pinpoint Cite to South Carolina Authority by depositing a copy of the same in the U.S. Mail, postage prepaid, on counsels of record for respondents:

R. Michael Ethridge, Esq.  
Suzanne E. Hogg, Esq.  
CARLOCK COPELAND & STAIR, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401-3351  
Counsels for Trademark Properties, Inc

Michael Scarafile, Esq.  
CAROLINA ONE REAL ESTATE  
4024 Salt Pointe Parkway  
Charleston, SC 29405  
Counsel for Carolina One Real Estate

June 10, 2015

  
Johnson Koola  
1587 Cambridge Lakes Dr  
Mt. Pleasant, SC 2946

5  
JOHNSON D KOOLA  
1587 Cambridge Lakes Dr  
Mt. Pleasant, SC 29464  
Phone: (843) 849-9241

**RECEIVED**

June 10, 2015

JUN 12 2015

SC Court of Appeals

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, S.C. 29201

Re: Johnson Koola v. Cambridge Two (2)  
Appellate Case No.: 2015-CP-000111

Sub: Motion Requesting Permission to Add Pinpoint Cite to South Carolina  
Authority in Citations

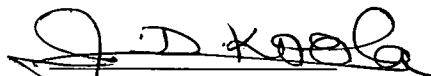
Dear Honorable Kitchings:

I am appellant pro se in the above appeal, Johnson Koola v. Cambridge Two (2).

Appellant is filing Motion Requesting Permission to Add Pinpoint Cite to South Carolina Authority in Citations in his Final and Final Reply Briefs. Enclosed herewith please find seven copies of Motion Requesting Permission to Add Pinpoint Cite to South Carolina Authority in Citations, proof of service and a filing fee of \$25.

Appellant thanks you in advance for your kind efforts.

Sincerely yours,



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

Copy to:  
R. Michael Ethridge, Esq.  
Suzanne Hogg, Esq.  
CARLOCK COPELAND & STAIR, LLP

Michael Scarafile, Esq.  
CAROLINA ONE REAL ESTATE

PLEASE PRESS FIRMLY

PLEASE

**P**



PM 2-DAY  
29464 0024  
Date of sale  
06/10/15  
06 2S00  
08308307 SSK

**PRIORITY MAIL 2-DAY™**

EXPECTED DELIVERY 06/13/2015

SHIP TO:

0024

COLUMBIA SC 29201-3726

USPS TRACKING NUMBER



9505 5000 0235 5161 0004 34



UNITED STATES POSTAL SERVICE

RECEIVED

JUN 12 2015

SC Court of Appeals

Rate Mailing Envelope

us at usps.com

From/Expéditeur:

Mr. Johnson Koola  
1587 Cambridge Lakes Dr  
Mt Pleasant, SC 29464-7300

INTERNATIONAL RESTRICTIONS APPLY:

International forms are required. Consult the International Mail Manual (IMM) at [pe.usps.gov](http://pe.usps.gov) or ask a retail associate for details.

To/Destinataire:

Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street

Columbia, S.C. 29201

Cot