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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the 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 theRespondents.

MOTION FOR SUBMISSION OF THE CASE WITH ORAL ARGUMENT AND HEARING *EN BLANC*

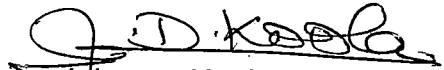
Appellant *pro se* Johnson Koola hereby moves this Court for an Order granting Oral Argument and Hearing of the above referenced appeal *en blanc*.

Under Rule 219, SCACR, a party can request that a matter be heard initially by the Court of Appeals *en blanc*. The adjudication of the above referenced appeal involves statutory interpretation of South Carolina Horizontal Property Act § 27-31-430. The interpretation of S.C. Code Ann. § 27-31-430 has wider

implications because a violation of this code automatically constitutes violation of South Carolina Unfair Trade Practices Act, § 39-5-10 *et seq.* Neither this Court nor the Supreme Court of South Carolina has ever rendered a Decision on S.C. Code Ann. § 27-31-430.

Appellant also requests that this appeal be submitted to the Court with Oral Argument.

Respectfully submitted,


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

Appellant *pro se*

September 19, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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The Honorable R. Markley Dennis, Jr., Circuit Court Judge SEP 21 2016

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APPELLATE CASE No.: 2015-000111

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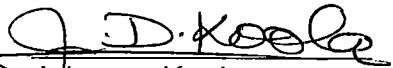
I, Johnson Koola, certify that I have served the forgoing Motion for Submission of the Case with Oral Argument and Hearing en blanc on the counsels of record for the respondents by depositing a copy of it in the United States Mail, postage prepaid, on September 21, 2016:

R. Michael Ethridge, Esq.
Suzanne E. Hogg, Esq.
Carlock, Copeland & Stair, LLC
40 Calhoun Street Suite 400
Charleston, SC 29401-3351
Trademark properties, Inc.

Michael Scarafile, Esq.
Carolina One Real Estate
4024 Salt Pointe Parkway
Charleston, SC 29405
Carolina One Real Estate

September 18, 2016

19


Johnson Koola
1587 Cambridge Lakes Dr
Mt Pleasant, SC 29464

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

September 19, 2016

The Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, S.C. 29201

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SC Court of Appeals

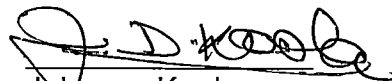
Re: Johnson Koola v. Cambridge Two (2)
Appellate Case No.: 2015-CP-000111
Sub: Motion for Submission of the Case with Oral Argument and Hearing *en blanc*.

Dear Honorable Kitchings:

Appellant pro se Johnson Koola files and serves appellant's Motion for Submission of the Case with Oral Argument and Hearing *en blanc*. Enclosed please find seven copies of the Motion and a check for \$25 as the motion-filing fee. Proof of Service is attached to copy of each Motion.

Appellant thanks you in advance for your kind efforts.

Sincerely yours,



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

Copy to:

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SC Court of Appeals

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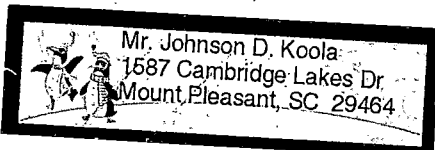
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