

PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

APPELLATE CASE NO. 2017-000822

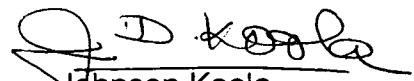
Johnson Koola,.....Petitioner,

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 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 FOR EXTENSION OF TIME PERIOD TO FILE PETITIONER'S REPLY
AND TO EXCEED THE TOTAL LENGTH OF PETITIONER'S REPLY



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

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APR 24 2017

S.C. SUPREME COURT

On April 5, 2017, petitioner *pro se* Johnson Koola filed the Petition for Writ of Certiorari in the above referenced appellate case, Johnson Koola v. Cambridge Two (2) and served the same on the counsels of record for the respondents, Trademark Properties, Inc. and Carolina One Real Estate.

(I) Petitioner's Reply is due within ten days after the service of Return by the respondents. Since the Return is received by mail after three days of service, and the Reply would be filed before the due date, petitioner would have effectively approximately five days to file the Reply. Petitioner *pro se* does not have access to online legal research and depends on public libraries for legal research. It would be very difficult to do legal research and file a quality Reply within the effectively available five (5) days of time.


(II) Petitioner expects to file a combined Reply to the Returns filed and served by the two respondents, Trademark Properties, Inc. and Carolina One Real Estate. Since a combined Reply is filed, it might be necessary to exceed the total page length of fifteen (15) pages allowed for a single Reply.

For the reasons stated above, petitioner moves this Court for an Order granting fifteen (15) days of time to file the Petitioner's Reply instead of the customary ten (10) days after the service of Return by both respondents and permitting to exceed the total length of the combined Reply to twenty (20) pages instead of the 15-page limit for a single Reply.

[Signature follows on the next page.]

Respectfully submitted,

April 21, 2017


Johnson Koola
1587 Cambridge Lakes Dr
Mt Pleasant, SC 20464
(843) 849-9241

Petitioner pro se

Counsels of Record for the Respondents:
Douglas W. MacKelcan, Esquire
Williams J. Farley, III, Esquire
Counsels for Trademark Properties, Inc.

Michael C. Scarafilo, Esquire
Counsel for Carolina One Real estate

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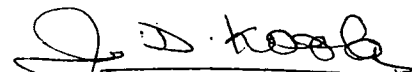
PROOF OF SERVICE

I, Johnson Koola, certify that on April 21, 2017, I served a copy of the petitioner's "Motion for Extension of Time Period to File Petitioner's Reply and To Exceed the Total Length of the Petitioner's Reply" on the counsels of record for the respondents as follows:

Douglas W. MacKelcan, Esq., and Williams J. Farley, III, Esq., Carlock Copeland & Stair, LLP 40, Calhoun Street, Suite 400, Charleston, SC 29401, Counsel for Trademark Properties, Inc.

Michael C. Scarafale, Esq., Carolina One Real estate, 4024 Salt Pointe Parkway Charleston, SC 29405, Counsel for Carolina One.

April 21, 2017


Johnson Koola