

PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

RECEIVED

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

MAY 11 2017

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

S.C. SUPREME COURT

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  
TO RESPONDENT TRADEMARK PROPERTIES, INC.'S RETURN

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

Petitioner *pro se*

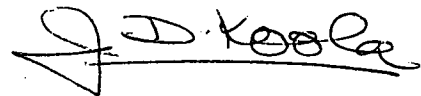
On April 5, 2017, petitioner *pro se* Johnson Koola filed the Petition for Writ of Certiorari in the above referenced appellate case, Johnson Koola v. Cambridge Two (2) and served the same on the counsels of record for the respondents. On May 5, 2017, respondent Trademark Properties, Inc., filed and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

Petitioner's Reply is due within ten days after the service of Return by the respondents. Since the Return is received by mail, petitioner has effectively less than ten days to file the Reply. Further, 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 manually and file a quality Reply within the limited time period available to the petitioner.

For the reasons stated above, petitioner moves this Court for an Order granting additional five (5) days of time to file the Petitioner's Reply to respondent Trademark Properties, Inc.'s Return.

Respectfully submitted,

May 10, 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 and Williams J. Farley, III, Esquire  
Michael C. Scarafile, Esquire

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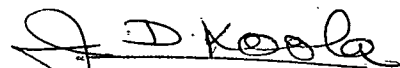
PROOF OF SERVICE

I, Johnson Koola, certify that on May 10, 2017, I served a copy of the petitioner's "Motion for Extension of Time Period to File Petitioner's Reply to Respondent Trademark Properties, Inc.'s Return" 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.

May 10, 2017

  
Johnson Koola