

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Appellate Case No. 2013-000279

The Honorable W. Jeffrey Young,  
Charleston County  
Trial Court Case No.: 2010-CP-10-9158

\_\_\_\_\_  
JOHNSON KOOLA, )  
 )  
Appellant, )  
 )  
vs. )  
 )  
CAMBRIDGE TWO, LLC, et al., )  
 )  
\_\_\_\_\_  
Respondents. )

**RECEIVED**  
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SC Court of Appeals

**APPELLANT'S DESIGNATION OF MATTERS TO BE  
INCLUDED IN THE RECORD ON APPEAL**

The appellant proposes the following to be included in the Record on Appeal:

1. September 4, 2012 Order and Judgment of Hon. W. Jeffrey Young Granting Respondents' Motions for Summary Judgment;
2. January 28, 2013 Letter/Notice Denying Appellant's Motion for Reconsideration of September 4, 2012 Order of Hon. W. Jeffrey Young;
3. Summons and Complaint of the Appellant;
4. January 27, 2012 Motion to Dismiss by Respondents Albert Estee and Cambridge Two, LP;
5. February 3, 2012 Motion to Dismiss by Respondents Stephen R. Heape and Cambridge Lakes, LP, et al.;

6. Transcript of July 25, 2013 Hearing Respondents' Motions to Dismiss (Converted into Summary Judgment) before Hon. W. Jeffrey Young;
7. August 1, 2013 Submission by Appellant in response to Respondents' Motions to Dismiss;
8. September 28, 2013 Motion by Appellant for Amendment and Reconsideration of September 4, 2013 Order of Hon. W. Jeffrey Young;
9. January 21, 2013 Letter from Counsel for Respondents Cambridge Two, LLC, et al. to Hon. W. Jeffrey Young;
10. Affidavits of Service of Summons and Complaint upon Respondents;
12. Notice of Appeal filed February 3, 2013.

I certify in accordance with Rule 209 of the S.C. Appellate Court Rules that this designation contains no matter which is irrelevant to this appeal.

Dated: May 10, 2013



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William B. Jung, Esq.  
1156 Bowman Road, Ste. 100-D  
Mount Pleasant, S.C. 29464  
(843) 416-1104

Attorney for the Appellant

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PROOF OF SERVICE

I, William B. Jung, Esq., under penalty of perjury, certify that on May 10, 2013, I served a copy of appellant's Designation of Matter to be Included in the Record on Appeal by mailing a true and accurate complete copy thereto to the following counsel of record for the respondents:

David J. Parrish, Esq.  
Nexsen Pruet, LLC  
P.O. Box 486  
Charleston, S.C. 29402

Linda Weeks Gangi, Esq.  
Thompson & Henry, P.A.  
P.O. Box 1740  
Conway, S.C. 29528-1740

May 10, 2013

  
\_\_\_\_\_  
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**PROOF OF SERVICE**

I, William B. Jung, Esq., under penalty of perjury, certify that on May 10, 2013, I served a copy of appellant's Initial Brief by mailing a true and accurate complete copy thereto to the following counsel of record for the respondents:

David J. Parrish, Esq.  
Nexsen Pruet, LLC  
P.O. Box 486  
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ADMITTED  
SOUTH CAROLINA  
NEW YORK

May 10, 2013

**By FedEx**

Ms. Jenny Abbott Kitchings  
Clerk of the Court  
S.C. Court of Appeals  
1015 Sumter Street  
Columbia, S.C. 29201

Re: Johnson Koola v. Cambridge Two, LLC, et al.  
Appeal Case No.: 2013-000279

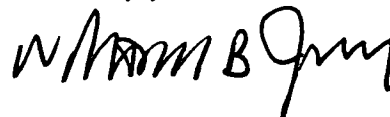
Dear Madame Clerk:

I represent the appellant, Johnson Koola, in the above appeal.

I am writing to file copies of the appellant's Initial Brief and Designation of Matters to be included in the Record on Appeal. Original Certificates of Service are attached to each document, and I am serving a copy of this letter and enclosures to the counsel for the respondents and deputy clerk assigned to this appeal as listed below.

Thank you for your courtesy and please advise if there is any issue with regard to this filing.

Sincerely yours,



William B. Jung

WBJ:wbj

cc. David Parrish, Esq. (w/encl.)  
Linda Gangi, Esq. (w/encl.)  
Ms. Elizabeth Carter (w/o encl.)

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