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Oct 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Hon. Donald B. Hocker, Circuit Court Judge

C.A. No.: 2020-CP-36-00384

Jefferson Davis, Jr. ....Appellant,

v.

Chad Connelly, Tom Persons, Geoffrey Chambers, *Esq.* & South Carolina Educational Credit for  
Exceptional Needs Children Fund ..... Respondents.

NOTICE OF APPEAL

Jefferson Davis, Jr. (“Davis”) appeals the Orders of the Honorable Donald B. Hocker as listed below:

- **ORDER 01:** 03/26/2021 – Order as to Motion to Dismiss
- **ORDER 02:** 06/14/2021 – Order Dismissing Chambers
- **ORDER 03:** 10/15/2021 – Order Compelling Discovery
- **ORDER 04:** 11/8/2021 – Order Deeming Admitted Defendant’s Connelly & Persons’ Request for Admission to Plaintiff & **Denying Plaintiff’s Request for Enlargement of Time to Respond or Withdraw or Amend the Admissions**
- **ORDER 05:** 12/15/2021 – Order RE Chambers
- **ORDER 06:** 09/19/2022 – Order Granting Summary Judgment in favor of Connelly & Persons
- **ORDER 07:** 9/19/2022 – Order Granting Connelly & Persons’ Motion for Sanctions
- **ORDER 08:** 1/3/2023 – Order Granting Defendant’s Motion for Sanctions (as to amounts)
- **ORDER 09:** 8/24/2023 – Order Denying Motion to Reconsider

Attached are copies of said Orders.

Davis received a service copy of the final order in the above referenced case on Friday, September 15<sup>th</sup>, 2023.

Date: October 13, 2023



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Jefferson Davis, Jr., Appellant  
2505 Wade Hampton Blvd.  
Greenville, SC 29615  
843-901-8036 (cell)  
*jeff@apogeetax.com*

Other Counsel of Record (Attorneys for Respondents):

M. Dawes Cooke, Jr., Esq. &  
Justin Paul Novak, Esq.  
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(843) 577-7700  
**Connelly, Persons & ECENC**

Geoffrey Chambers, Esq.  
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Green Cove Springs, FL 32043  
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**Chambers**

Clerk of Court - Newberry County  
Elizabeth P. Folk  
PO Drawer 10  
Newberry, SC 29108

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PROOF OF SERVICE

I certify that I have served the **Notice of Appeal** on the below named parties on **October 13<sup>th</sup>, 2023**, pursuant to Rule 262 and associated Orders by email to the attorney's primary email address as noted below.

M. Dawes Cooke, Jr., Esq. &  
Justin Paul Novak, Esq.  
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**Chambers**



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APPELLANT

October 13, 2023

VIA US MAIL & EMAIL ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
**Oct 13 2023**  
SC Court of Appeals

**RE: Jefferson Davis Jr, Appellant vs. Chad Connelly, Tom Persons, Geoffrey Chambers, Esq. & South Carolina Educational Credit for Exceptional Needs Children Fund, Respondents**  
**C.A. NO. 2020-CP-36-00384 (filed 9/11/2020)**

Dear Ms. Kitchings:

Please find enclosed the following for the above referenced matter. Only one copy is enclosed (*or in this case attached*) pursuant to directions from the Court.

1. **Notice of Appeal**
2. **Proof of Service**
3. **A copy of the following:**
  - a. **ORDER #01:** Order as to Motion to Dismiss (3/26/2021)
  - b. **ORDER #02:** Order Dismissing Chambers (6/14/2021)
  - c. **ORDER #03:** Order Compelling Discovery (10/15/2021)
  - d. **ORDER #04:** Order Deeming Admitted Defendants Chad Connelly & Tom Persons' Requests for Admission to Plaintiff & **Denying Plaintiff's Request for Enlargement of Time to Respond or to Withdraw or Amend the Admissions** (11/08/2021)
  - e. **ORDER #05:** Order RE Chambers (12/15/2021)
  - f. **ORDER #06:** Order Granting Summary Judgment in favor of Connelly & Persons (9/19/2022)
  - g. **ORDER #07:** Order granting Defendants Connelly & Persons Motion for Sanctions (9/19/2022)
  - h. **ORDER #08:** Order granting Defendant's Motion for Sanctions against Plaintiff (as to amounts) (filed 1/3/2023)
  - i. **ORDER #09:** Denying Plaintiffs Motion to Reconsider (8/24/2023)

**4. A filing fee of \$250.00 (Being Mailed to Court of Appeals Separately)**

Thank you for your assistance. If you have any questions, please feel free to email me at [jeff@apogeetax.com](mailto:jeff@apogeetax.com) or give me a call at 843-901-8036 (cell).

Sincerely,



Jeff Davis, *JD, MBA, CPA(GA)*

Plaintiff / Appellant

2505 Wade Hampton Blvd., Greenville, SC 29615

843-901-8036 (cell) | [jeff@apogeetax.com](mailto:jeff@apogeetax.com)

cc: Dawes Cooke, Jr., Esq., Justin P. Novak, Esq., (Connelly, Wilson, Persons, & Mellen)

Geoffrey K. Chambers, Esq. (Chambers)

*Attorneys for Defendants at the trial court level in the Court of Common Pleas.*

Newberry County Clerk of Court