

**RECEIVED**

**Jan 11 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge  
Case No.: 2020-CP-36-00382

Appellate Case No. 2023-001623

Jefferson Davis, Jr.....Appellant,

v.

Chad Connelly; Dave Wilson; Stephen Kirkland; Tom Persons;  
Neil Mellen; E3 Software, LLC; Endurance International Group Holdings, Inc.;  
John Doe #1; John Doe #2; & John Does 3-40..... Respondents.

**NOTICE OF APPEARANCE OF JASMINE D. SMITH FOR  
RESPONDENT E3 SOFTWARE, LLC**

PLEASE TAKE NOTICE that the undersigned attorney hereby notifies and advises this Court, the above-captioned parties, and all counsel of record, that she is appearing as counsel for Respondent E3 Software, LLC in the above-captioned matter. The undersigned hereby requests to be notified of any and all proceedings and copied on all pleadings, discovery, motions and the like in matters regarding this action, as attorney for this Respondent.

*(Signature page to follow)*

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

s/Jasmine D. Smith

Jasmine D. Smith (SC Bar No. 100758)

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

*Attorney for Respondent E3 Software, LLC*

January 11, 2024

RECEIVED

Jan 11 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge  
Case No.: 2020-CP-36-00382

Appellate Case No. 2023-001623

Jefferson Davis, Jr.....Appellant,

v.

Chad Connelly; Dave Wilson; Stephen Kirkland; Tom Persons;  
Neil Mellen; E3 Software, LLC; Endurance International Group Holdings, Inc.;  
John Doe #1; John Doe #2; & John Does 3-40..... Respondents.

**PROOF OF SERVICE**

I certify that I have served the following *Notice of Appearance of Jasmine D. Smith for Respondent E3 Software* in the above-referenced matter on all parties by electronic mail and by depositing a copy of it in the United States Mail, postage prepaid, on January 11, 2024, addressed to the pro-se Appellant as follows:

Jefferson Davis  
2505 Wade Hampton Blvd.  
Greenville, SC 29615  
[jeff@apogeetax.com](mailto:jeff@apogeetax.com)  
*Pro-Se Appellant - via email and regular U.S. mail*

M. Dawes Cooke, Jr., Esquire  
Justin P. Novak, Esquire  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, South Carolina 29402  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)

[jnovak@barnwell-whaley.com](mailto:jnovak@barnwell-whaley.com)

***Attorneys for Respondents Chad Connelly,  
Dave Wilson, Tom Persons, and Neil  
Mellen – via email***

Douglas W. MacKelcan, Esquire  
Skyler C. Wilson, Esquire, Esquire  
Copeland Stair Valz & Lovell LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401

[dmackelcan@csvl.law](mailto:dmackelcan@csvl.law)

[swilson@csvl.law](mailto:swilson@csvl.law)

***Attorneys for Respondent Stephen D.  
Kirkland – via email***

Susie J. Lloyd, Esquire  
Cozen O'Connor  
301 S. College Street  
Charlotte, NC 28202

[slloyd@cozen.com](mailto:slloyd@cozen.com)

***Counsel for Respondent Endurance International Group Holdings, Inc. – via email***

ROBINSON GRAY STEPP & LAFFITTE, LLC

s/Jasmine D. Smith

Jasmine D. Smith (SC Bar No. 100758)

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

Attorney for Respondent E3 Software, LLC

January 11, 2024

**From:** [Christine Skalamera](#)  
**To:** [jdavis@apogeetax.com](mailto:jdavis@apogeetax.com); [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com); [jnovak@barnwell-whaley.com](mailto:jnovak@barnwell-whaley.com); [sloyd@cozen.com](mailto:sloyd@cozen.com); [Doug MacKelcan](#); [swilson@cslv.law](mailto:swilson@cslv.law); [rmoran@cslv.law](mailto:rmoran@cslv.law); [trewt@cslv.law](mailto:trewt@cslv.law)  
**Cc:** [Jasmine D. Smith](#); [Cal Watson](#); [Emma McCabe](#)  
**Subject:** Appellate Court Case No.: 2023-001623; Jefferson Davis, Jr., v. Chad Connelly; Dave Wilson; Stephen Kirkland; et al  
**Date:** Thursday, January 11, 2024 12:01:48 PM  
**Attachments:** [image001.png](#)  
[2024.01.11 Notice of Appearance \(Jasmine D. Smith\).pdf](#)  
[2024.01.11 Proof of service - Notice of Appearance - JDS for E3.pdf](#)

---

**Re: Appellate Court Case No.: 2023-001623**

Good afternoon,

Enclosed and herewith served upon you, please find a *Notice of Appearance of Attorney Jasmine D. Smith, on behalf of Respondent E3 Software, LLC* in the above-referenced matter.

A copy will also be mailed to Mr. Davis.

The above will be filed with the South Carolina Court of Appeals and a copy of this email will be filed with the Proof of Service.

With kind regards,

Christine L. Skalamera  
Robinson Gray Stepp & Laffitte, LLC  
803-231-7808 direct office  
[cskalamera@robinsongray.com](mailto:cskalamera@robinsongray.com)



**CHRISTINE SKALAMERA**  
DIRECT 803.231.7808  
**VCARD**  
**ROBINSONGRAY.COM**

LEGAL ASSISTANT  
2151 Pickens Street  
Suite 500  
PO Box 11449 (29211)  
Columbia, SC 29201

 MERITAS<sup>®</sup> LAW FIRMS WORLDWIDE



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please delete this message from your device.

**Supporting Green** print wisely.



ROBINSON  
GRAY

Litigation + Business

JASMINE D. SMITH

DIRECT 803 231.7841 DIRECT FAX 803.929.0300

jsmith@robinsongray.com

January 11, 2024

**Via Electronic Mail Only**

Jenny Abbott Kitchings, Clerk South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RECEIVED

Jan 11 2024

SC Court of Appeals

Re: Jefferson Davis, Jr., v. Chad Connelly; Dave Wilson; Stephen Kirkland; et al.  
Appellate Court Case No.: 2023-001623  
Newberry County Case No.: 2020-CP-36-00382  
Our File No.: 5478/1560

Dear Ms. Kitchings:

Enclosed for filing, please find my Notice of Appearance in the above-referenced matter on behalf of Respondent E3 Software, LLC. By copy of this letter, we are providing the same to all counsel of record, as well as pro se Appellant. Should you need anything further, please let us know.

Respectfully,

Jasmine D. Smith

JDS:cls

Enclosures

cc:

Jefferson Davis  
2505 Wade Hampton Blvd.  
Greenville, SC 29615  
[jeff@apogeetax.com](mailto:jeff@apogeetax.com)  
***Pro-Se Appellant - via email and regular U.S.  
mail***

M. Dawes Cooke, Jr., Esquire  
Justin P. Novak, Esquire  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, South Carolina 29402  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
[jnovak@barnwell-whaley.com](mailto:jnovak@barnwell-whaley.com)  
***Attorneys for Respondents Chad Connelly,  
Dave Wilson, Tom Persons, and Neil  
Mellen – via email***



Douglas W. MacKelcan, Esquire  
Skyler C. Wilson, Esquire, Esquire  
Copeland Stair Valz & Lovell LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
[dmackelcan@csvl.law](mailto:dmackelcan@csvl.law)  
[swilson@csvl.law](mailto:swilson@csvl.law)  
***Attorneys for Respondent Stephen D.  
Kirkland – via email***

Susie J. Lloyd, Esquire  
Cozen O'Connor  
301 S. College Street  
Charlotte, NC 28202  
[slloyd@cozen.com](mailto:slloyd@cozen.com)  
***Counsel for Respondent Endurance  
International Group Holdings, Inc. – via  
email***