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Jan 23 2025

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-36-00382 &
C.A. No.: 2020-CP-36-00384
Appellate Case No 2024-002049

Jefferson Davis, Jr.Appellant,

v.

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

and

Jefferson Davis, Jr.Appellant,

v.

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

STATUS UPDATE

On December 20th, 2024, this Court granted a temporary stay of the circuit courts order of
civil contempt, remanded the matter to the circuit court for an expedited hearing on the Writ of
Supersedeas, and directed the Appellant to provide a status update every 30 days.

The following is Appellant's initial status update:

- December 23rd, 2024: The Court of Appeals December 20th, 2024, Order on the Writ of Supersedes was filed with the circuit court.
- December 23rd, 2024: Respondents Chad Connelly, Dave Wilson, Tom Persons, Neil Mellen, and South Carolina Educational Credit for Exceptional Needs Children Fund filed **Defendants' Joint Motion for Expedited Discovery** asking for discovery responses within 10 days as opposed to the typical 30 days.
- December 27th, 2024: Respondents Chad Connelly, Dave Wilson, Tom Persons, and Neil Mellen ("Defendants") file an additional, and intentionally harassing, **MOTION FOR AN ORDER OF CONTEMPT AND ADDITIONAL SANCTIONS**. No action has been taken on this Motion.
- January 8th, 2024: An "unnoticed" (*Appellant was cc'd on an email to the court 1 hour prior to the 9:30am hearing*) hearing was held on the December 23rd, 2024, Defendants' Joint Motion for Expedited Discovery. An extension request by Appellant Davis, since the hearing was "unnoticed", was denied.

Appellant Davis had no objection to expedited discovery timeline. However, extensive "unnoticed" discussion of what specific discovery was to be provided ensued. Since Appellant Davis had not reviewed the discovery request, the court allowed him until January 14th to (#1) review the discovery request from Defendants, and (#2) to respond to the court as to what objects he might have to the requests (*to which Appellant complied, but gave a general objection to this "out of order" discovery process*).

- January 14th, 2024: Appellant Davis **timely** filed his **Memorandum in Response to Defendants’ Joint Motion for Expedited Discovery**. Appellant Davis included his general objections to the multiple procedural issues, including the “out of typical order” of discovery responses, as well as identified document he had no objection to providing. Appellant Davis did request for (#1) his **medical records** to be reviewed *in camera* and for the court to validate the general medical claims (*ie, that he had colon cancer, an initial 12% projected 5-year survival rate, major surgery, chemotherapy & ongoing medical needs including a follow-up major reconstructive surgery to schedule – but NOT to disclose his medical providers out of fear they would be harassed*), & (#2) that his **financial records** would be subject to a **strict Protective Order** so that his financials would not be posted on social media by associates of the opposing parties, if not the parties themselves – which has been the history in this “lawfare” case.
- As of TODAY, January 23rd, 2025: There has been no further action from the circuit court as the parties await further direction.

Respectfully submitted,



Date: January 23, 2025

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PROOF OF SERVICE

I certify that I have served Appellant’s **STATUS UPDATE** on the below named parties
via First Class Mail **and email** on **January 23rd, 2025**.

[CONTINUED ON NEXT PAGE.]

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**Non-Party - Educational Credit For Exceptional Needs
Children Fund (ECENC Fund, aka Exceptional SC)**

[CONTINUED ON NEXT PAGE.]

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