

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

RECEIVED

Apr 25 2025

Hon. Donald B. Hocker, Circuit Court Judge

SC Court of Appeals

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 20<sup>th</sup>, 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.

On **January 23<sup>rd</sup>, 2025**, Appellant filed his initial (#01) status update.

On **February 24<sup>th</sup>, 2025**, Appellant filed his second (#02) status update.

On **March 25<sup>th</sup>, 2025**, Appellant filed his third (#03) status update.

The following is Appellant's forth (#04) status update:

- **FROM LAST STATUS UPDATE: March 17<sup>th</sup>, 2025:** Judge Hocker set a deadline of March 27<sup>th</sup>, 2025, as the deadline to submit any other medical records, and April 7<sup>th</sup>, 2025 as the deadline for the other side to respond. After that time Judge Hocker will hold a hearing.
- **April 7<sup>th</sup>, 2025:** Defendant's electronically filed a response the trial court. **No certificate of service was provided.** Appellant, as a *pro se* party, does not receive service from the court system, but has agreed to receive service at his correct email ([jeff@apogeetax.com](mailto:jeff@apogeetax.com)).
- **April 8<sup>th</sup>, 2025:** Defendant's attempted service upon Appellant at an old email address which has been the subject of multiple Court discussions and direction for Defendant's to correct. Appellant notified the Court again, and the Court once again ordered the Defendant's to correct the email address. SEE ATTACHED.
- **April 18<sup>th</sup>, 2025:** Judge Hocker gave a status update as to his schedule and to expect a communication as to next steps. SEE ATTACHED.
- **April 22<sup>nd</sup>, 2025:** Appellant started a 2<sup>nd</sup> round of chemotherapy treatments in expectation of a major surgery in July / August 2025. Medical documentation has been provided to the

trial court and direction as to a STAY (or DISMISSAL) was requested from the trial court on April 8<sup>th</sup>, 2025.

- **April 25<sup>th</sup>, 2025:** Appellant again requested direction from the trial court as to requesting a STAY or DISMISSAL given the updated medical records and proof renewed chemotherapy treatments have started.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Davis', with a stylized flourish at the end.

Date: April 25<sup>th</sup>, 2025

---

Jefferson Davis, Jr., Appellant  
403 McCarter Avenue  
Greenville, SC 29615  
843-901-8036 (cell)  
*jeff@apogeetax.com*



Jeff Davis &lt;jeff@apogeetax.com&gt;

**RE: Davis v. Connelly, et al; 2020-CP-36-00382 & 2020-CP-36-00384**

1 message

**Hocker, Donald B.** <dhockerj@sccourts.org>

Tue, Apr 8, 2025 at 3:57 PM

To: Jeff Davis &lt;jdavis@apogeetax.com&gt;, Anthony Baglivo &lt;abaglivo@barnwell-whaley.com&gt;

Cc: "dhockersc@sccourts.org" &lt;dhockersc@sccourts.org&gt;, "g.k.chambers@gmail.com" &lt;g.k.chambers@gmail.com&gt;, "geoffrey@cperlgroup.com" &lt;geoffrey@cperlgroup.com&gt;, "M. Dawes Cooke, Jr." &lt;mdc@barnwell-whaley.com&gt;, "Justin P. Novak" &lt;jnovak@barnwell-whaley.com&gt;, Karen Jessee &lt;kjessee@barnwell-whaley.com&gt;, Jeff Davis &lt;jeff@apogeetax.com&gt;

I would ask everyone to use correct email addresses so that receipt will be accomplished. Thank you. (dbh)

**From:** Jeff Davis <jdavis@apogeetax.com>**Sent:** Tuesday, April 8, 2025 1:12 PM**To:** Anthony Baglivo <abaglivo@barnwell-whaley.com>**Cc:** Hocker, Donald B. <dhockerj@sccourts.org>; dhockersc@sccourts.org; g.k.chambers@gmail.com; geoffrey@cperlgroup.com; M. Dawes Cooke, Jr. <mdc@barnwell-whaley.com>; Justin P. Novak <jnovak@barnwell-whaley.com>; Karen Jessee <kjessee@barnwell-whaley.com>; Jeff Davis <jeff@apogeetax.com>**Subject:** Re: Davis v. Connelly, et al; 2020-CP-36-00382 & 2020-CP-36-00384

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Judge Hocker ...

I just want to point out for the record for about the 10th time - Defendants continue to use the incorrect email for me. This is not the email address that I use or have given to the court and opposing counsel for these legal cases.

**You kindly and very deliberately had me give everyone my correct email address (jeff@apogeetax.com) at the last zoom hearing we had back on January 8th, 2025. Everyone wrote it down, yet Mr Cooke & Mr. Novak's office continues to use the wrong email address.**

**At this stage, would the Court please issue an Order directing opposing counsel to communicate with me at the correct email address - although I have a presumption opposing counsel is doing this on purpose.**

I would also call attention to the Court that there is no accompanying CERTIFICATE OF SERVICE and is part of the reason I rarely / haphazardly receive filings from opposing counsel.

Thank you sir.

Best,

Jeff Davis

843-901-8036 (cell)

[jeff@apogeetax.com](mailto:jeff@apogeetax.com)

On Tue, Apr 8, 2025 at 10:28 AM Anthony Baglivo <[abaglivo@barnwell-whaley.com](mailto:abaglivo@barnwell-whaley.com)> wrote:

Good morning,

Attached please find courtesy copies of Defendants' Reply Memorandum filed yesterday afternoon in these matters.

By copy of this email, we are providing notice of the same upon counsel of record and the pro-se Plaintiff.

Respectfully,



**ANTHONY BAGLIVO | PARALEGAL**

**BARNWELL WHALEY PATTERSON & HELMS, LLC**  
Charleston, SC | Wilmington, NC (PLLC)  
**211 King Street, Suite 300 | Charleston, SC 29401**  
**843-577-7700 | 843-329-5317 (D)**  
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Jeff Davis &lt;jeff@apogeetax.com&gt;

**RE: Davis v. Connelly, et al; 2020-CP-36-00382 & 2020-CP-36-00384**

1 message

**Hocker, Donald B.** <dhockerj@sccourts.org>

Fri, Apr 18, 2025 at 10:49 AM

To: Geoffrey Chambers &lt;g.k.chambers@gmail.com&gt;, Jeff Davis &lt;jeff@apogeetax.com&gt;

Cc: Justin Novak &lt;jnovak@barnwell-whaley.com&gt;, "M. Dawes Cooke" &lt;mdc@barnwell-whaley.com&gt;, Anthony Baglivo &lt;abaglivo@barnwell-whaley.com&gt;, Karen Jessee &lt;kjessee@barnwell-whaley.com&gt;

All: Thank you for your patience. Here is my plan. Next week I will be working on the coast. The following week I will be in chambers all week except for the 6<sup>th</sup>. I will work on this file and let you know the direction I want us to head in. (dbh)

**From:** Geoffrey Chambers <g.k.chambers@gmail.com>**Sent:** Wednesday, April 9, 2025 5:11 AM**To:** Jeff Davis <jeff@apogeetax.com>**Cc:** Hocker, Donald B. <dhockerj@sccourts.org>; Justin Novak <jnovak@barnwell-whaley.com>; M. Dawes Cooke <mdc@barnwell-whaley.com>; Anthony Baglivo <abaglivo@barnwell-whaley.com>; Karen Jessee <kjessee@barnwell-whaley.com>**Subject:** Fwd: Davis v. Connelly, et al; 2020-CP-36-00382 & 2020-CP-36-00384

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All,

Forwarding to Mr. Davis' preferred email address. I think this corrects the service issue.

Geoffrey Chambers

----- Forwarded message -----

**From:** Anthony Baglivo <abaglivo@barnwell-whaley.com>**Date:** Tue, Apr 8, 2025, 10:28 AM**Subject:** Davis v. Connelly, et al; 2020-CP-36-00382 & 2020-CP-36-00384**To:** dhockerj@sccourts.org <dhockerj@sccourts.org>, dhockersc@sccourts.org <dhockersc@sccourts.org>**Cc:** jdavis@apogeetax.com <jdavis@apogeetax.com>, g.k.chambers@gmail.com <g.k.chambers@gmail.com>, geoffrey@cperlgrou.com <geoffrey@cperlgrou.com>, M. Dawes Cooke, Jr. <mdc@barnwell-whaley.com>, Justin P. Novak <jnovak@barnwell-whaley.com>, Karen Jessee <kjessee@barnwell-whaley.com>

Good morning,

Attached please find courtesy copies of Defendants' Reply Memorandum filed yesterday afternoon in these matters.

By copy of this email, we are providing notice of the same upon counsel of record and the pro-se Plaintiff.

Respectfully,

 A picture containing company name Description automatically generated

**ANTHONY BAGLIVO | PARALEGAL**

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