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May 28 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 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.

On **April 25<sup>th</sup>, 2025**, Appellant filed his fourth (#04) status update.

The following is Appellant's fifth (#05) status update:

- **FROM LAST STATUS UPDATE: 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.
- **May 1<sup>st</sup>, 2025:** The involved parties received an email with attached Order #2 from Judge Hocker. See ATTACHMENT. Although *Pro Se* Plaintiff / Appellant Davis had provided medical documentation indicating his scheduled chemotherapy treatments as well as a major surgery scheduled in July, 2025, Judge Hocker Ordered Plaintiff Davis to provide actual letters from his treating physician(s) – in this case three separate doctors.
- **May 9<sup>th</sup>, 2025:** After an exhaustive effort, Appellant secured physical letters from his treating physicians (1 oncologist MD, 2 surgical oncologist MS & 1 oncology nurse practitioner).
- **May 16<sup>th</sup>, 2025:** Appellant submitted to the trial court a 15 page (including exhibits) signed **Sworn Affidavit** with supporting medical and other documents detailing the his **Stage IV colon cancer** and other items related to this matter. See **REDACTED** ATTACHMENT.

- As part of the above Sworn Affidavit (Item #15), Appellant once again concluded & requested a dismissal of this matter as clearly Appellant has **Stage IV colon cancer**, substantial medical expenses related to such health issues, and was in no way exhibited “willful civil contempt” for any Court Order.

Respectfully submitted,

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

Date: May 27<sup>th</sup>, 2025

---

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

---

**Davis v. Connelly, et.al.**

---

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

Thu, May 1, 2025 at 11:00 AM

To: Jeff Davis &lt;jeff@apogeetax.com&gt;, Geoffrey Chambers &lt;g.k.chambers@gmail.com&gt;, Justin Novak &lt;jnovak@barnwell-whaley.com&gt;

Cc: Janeen Toby &lt;jtoby@newberrycounty.gov&gt;

See Enclosed.

Please be advised that I am not trying to delay resolution of this matter any further than both sides desire. I just want to be as thorough and fair to both sides as I possibly can be. (dbh)

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

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 **Davis v. Connelly Exp Order 2 emailed.pdf**  
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STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF NEWBERRY )

JEFFERSON DAVIS, JR. )  
 )  
Plaintiff )  
 )  
vs. )  
 )  
CHAD CONNELLY, et.al. )  
 )  
Defendant )  
\_\_\_\_\_ )

ORDER  
2020-CP-36-00382 and 384  
Appellate Case No. 2024-002049

This Order is being issued without a hearing.

The Plaintiff has provided the Court with voluminous medical records pursuant to Court Order of January 23, 2025. Further indication from the Plaintiff is that he has or will undergo chemotherapy for his cancer and may have surgery sometime in the future.

The Court needs to know the anticipated time frame for the completion of the above treatment/surgery including the frequency of chemotherapy treatments and this information needs to come directly from the Plaintiff's treating physician(s). This will assist the Court in determining how matters will



proceed in this case as it relates to the issue of contempt.

Consequently, the Plaintiff shall provide to the Court and opposing counsel a letter/letters from Plaintiff's treating physician(s) providing the above information within fifteen (15) days from the date of this Order.

So Ordered.



---

DONALD B. HOCKER  
CIRCUIT COURT JUDGE

Laurens, South Carolina  
Date: 5-1-25

#2

STATE OF SOUTH CAROLINA  
COUNTY OF NEWBERRY

) IN THE COURT OF COMMON PLEAS  
) EIGHTH JUDICIAL CIRCUIT  
)

) C.A. NO. 2020-CP-36-00382  
)

Jefferson Davis, Jr.,  
)

) Plaintiff,  
)

) vs.  
)

) **SWORN AFFIDAVIT OF**  
) **JEFFERSON DAVIS, JR.**  
)

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

) Defendants.  
)

And

STATE OF SOUTH CAROLINA  
COUNTY OF NEWBERRY

) IN THE COURT OF COMMON PLEAS  
) EIGHTH JUDICIAL CIRCUIT  
)

) C.A. NO. 2020-CP-36-00384  
)

Jefferson Davis, Jr.,  
)

) Plaintiff,  
)

) vs.  
)

) **SWORN AFFIDAVIT OF**  
) **JEFFERSON DAVIS, JR.**  
)

) Chad Connelly, Tom Persons, Geoffrey  
) Chambers, Esq., and South Carolina  
) Educational Credit for Exceptional Needs  
) Children Fund,  
)

) Defendants.  
)

The undersigned, being duly sworn and deposed, sayeth that:

1. I am a resident and elector of Greenville County, South Carolina, and the Plaintiff in the two above captioned cases.
2. I have been a licensed tax attorney (since 1994) and CPA (since 1997) in the State of Georgia for 31 & 28 years respectively, with no private nor public reprimands over that time period – and no history of lies, perjury or noncompliance with any court order.

3. Attached as **EXHIBIT A** is my Sworn Declaration dated October 11<sup>th</sup>, 2024, as presented to the Court and Judge Hocker at the October 11<sup>th</sup>, 2024, hearing in Newberry, SC, detailing in item #8 the health issues / colon cancer I had been experiencing and that I was currently **“working with my colorectal surgeon to schedule a major follow-up ureter / kidney reconstruction surgery (likely out of state) later this year or in the first quarter of 2025.”**
4. Items #9 & #10 of **EXHIBIT A** detail my inability to pay court ordered legal fees to reimburse Defendant’s insurance company (*which has already paid the fees to legal counsel*), as well as my attempts to resolve the matter with Defendants.
5. Given my professional background, as a member of the Georgia Bar, and as a Georgia licensed CPA, I had no expectation that my Sworn Declaration and sworn testimony in Court at the October 11<sup>th</sup>, 2024 hearing as to my health condition (*colon cancer*) and current inability to pay court ordered fees to reimburse Defendants insurance company, would bear no weight with the Court in a contempt hearing.
6. Attached as **EXHIBIT B** is a partial transcript of the October 11<sup>th</sup>, 2024, court hearing whereby the Court stated the following:

*“But bold [sworn] statements that you had health issues and therefore can't pay without any supporting documents from doctors or whoever to support that, it is hard for me to put much faith into your statement insofar as allowing that to be a defense to this contempt action.”*

7. Attached as **EXHIBIT C** (*letter only, no medical records attached*) is the letter I provided Judge Hocker the afternoon of October 11<sup>th</sup>, 2024, with 132 pages of medical and financial records detailing my **Stage IV colon cancer** and **\$531,394.13 in medical bills** for the Court’s consideration before issuing its final order.
8. The provision of these medical records and bills as listed above and in **EXHIBIT C** did not change the Courts’ initial ruling at the hearing of willful noncompliance & willful civil contempt.
9. **CANCER RECURRANCE DUE TO COURT ORDER / LACK OF COURT RECOGNITION / LACK OF DEFENDNATS CONSESSION OF PLAINTIFFS CANCER DIAGNOSIS & TREATMENTS:** Given the Courts ruling of willful noncompliance & willful civil contempt (*which has been appealed*) and the imminent threat of arrest with an initial 90-days in jail as promoted constantly on social media by Defendants and/or their legal counsel and other surrogates, I was unable to continue my search for a follow-up ureter / kidney surgery I had expected to have in the 4<sup>th</sup> quarter of 2024 / 1<sup>st</sup> quarter of 2025. (SEE Sworn Declaration in Item #3 above.) Due to the delayed medical treatment, my sigmoid colon cancer grew back from under the **ureter clips** which would have been removed had I had this surgery as initially planned and communicated to the Court. As such, I am now having to have (#1) an additional four heavy chemotherapy treatments before the ureter surgery and (#2) a previously unrequired full Peritoneal Resection surgery – both surgeries scheduled for July 2025.

10. Attached as **EXHIBIT D** is a May 1<sup>st</sup>, 2025, Order (#2) in the remanded appeal detailing that although I have provided voluminous medical records as I was ordered by the Court to provide, the Court has now requested I provide letters from my medical team detailing my medical condition, chemotherapy & surgical schedule.
11. **DOCTOR NOTE #1:** Attached as **EXHIBIT E** is a true and correct copy of a May 7<sup>th</sup>, 2025, letter from my oncologist, [REDACTED] MD with [REDACTED] with an update as to my current medical condition and an expected date to “reengage” in most activities by **October 1, 2025**.
12. **NURSE PRACTITIONER NOTE #2:** Attached as **EXHIBIT F** is a true and correct copy of a May 6<sup>th</sup>, 2025, letter from my oncology nurse practitioner, [REDACTED] with an update as to my current medical condition and an expected date to “complete” my treatments of **November 21<sup>st</sup>, 2025**.
13. **DOCTOR NOTE #3:** Attached as **EXHIBIT G** is a true and correct copy of a May 7<sup>th</sup>, 2025, letter from my surgical oncologist, [REDACTED] with an update as to my current medical condition and an expected date to “reengage” in most activities by **September 15<sup>th</sup>, 2025**.
14. **DOCTOR NOTE #4:** Attached as **EXHIBIT H** is a true and correct copy of a May 7<sup>th</sup>, 2025, letter from my surgical urologist, [REDACTED] with an update as to my current medical condition and an expected date to “reengage” in most activities by **September 15<sup>th</sup>, 2025**.
15. **CONCLUSION & REQUEST FOR DISMISSAL IN THE INTEREST OF JUSTICE:**  
Upon information, research and discussions with medical professionals, it is my belief that if this contempt action is not reversed given the voluminous medical records now proving my colon cancer (*as specifically directed on remand by the SC Court of Appeals*), the stress of the uncertainty in this matter, and the continued threats by Defendants and/or their surrogates, that my health and medical condition will further decline, perhaps leading to my ultimate death.

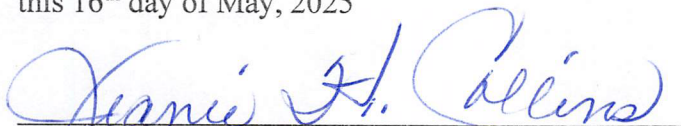
FURTHER AFFIANT SAYETH NOT!



Jefferson Davis, Jr.

Sworn to and subscribed before me

this 16<sup>th</sup> day of May, 2025



Notary Public for The State of South Carolina

JEANIE H. COLLINS  
Notary Public, State of South Carolina  
My Commission Expires March 27, 2028

My Commission Expires: March 27, 2028

# EXHIBIT A

|                                              |   |                              |
|----------------------------------------------|---|------------------------------|
| STATE OF SOUTH CAROLINA                      | ) | IN THE COURT OF COMMON PLEAS |
| COUNTY OF NEWBERRY                           | ) | EIGHTH JUDICIAL CIRCUIT      |
|                                              | ) |                              |
|                                              | ) | C.A. NO. 2020-CP-36-00382    |
| Jefferson Davis, Jr.,                        | ) |                              |
|                                              | ) |                              |
| Plaintiff,                                   | ) |                              |
|                                              | ) |                              |
| vs.                                          | ) |                              |
|                                              | ) |                              |
| Chad Connelly, Dave Wilson, Stephen          | ) |                              |
| Kirkland, Tom Persons, Neil Mellen, John Doe | ) |                              |
| #1 & John Doe #2,                            | ) |                              |
|                                              | ) |                              |
| Defendants.                                  | ) |                              |

**DECLARATION OF JEFFERSON DAVIS, JR.**

1. My name is Jefferson Davis, Jr. I am more than eighteen (18) years of age and competent to testify to the matters stated in this Declaration. The facts provided in this declaration are based upon my personal knowledge.
2. I am the *Pro Se* Plaintiff in the above captioned case, and I am a resident and elector of Greenville County, South Carolina.
3. The above captioned case was appealed to the South Carolina Court of Appeals and Ordered dismissed on procedural grounds on March 6<sup>th</sup>, 2024, with a Remittitur filed by the same Court on March 22<sup>nd</sup>, 2024.
4. The Remittitur was filed with the Newberry Court on March 26<sup>th</sup>, 2024.
5. Although the initial Order to pay fees was filed on January 3<sup>rd</sup>, 2023, Plaintiff Davis filed a timely Motion to Reconsider which was not ruled upon until August 24<sup>th</sup>, 2023, following which a timely appeal was filed to the SC Court of Appeals.
6. It is my understanding, and based on this Court’s order delaying a previous Rule to Show Cause hearing due to the appeal, that fees were not to be paid until complete resolution of the matter and the appeal is finalized.
7. Subsequent events which began during the appeal have prevented me from being able to pay the ordered fees.
8. **Health Issues / Colon Cancer:** As the Defendants are certainly aware, in the 3<sup>rd</sup> quarter of 2023 I began suffering from severe health issues. In February of 2024, I was diagnosed with Sigmoid Colon Cancer at the Mayo Clinic in Jacksonville Florida. On March 18<sup>th</sup>, 2024, I underwent a 4 hour and 40-minute robotic surgery to remove the referenced colon cancer. Following surgery and initial recovery, I underwent substantial chemotherapy

treatment through July 5<sup>th</sup>, 2024, and is in recovery. Currently I continue to deal with these severe health / cancer issues. It has been recommended to me by two separate oncologist that I should undergo additional chemotherapy treatment at this time, and I am currently working with my colorectal surgeon to schedule a major follow-up ureter / kidney reconstructive surgery (*likely out of state*) later this year or in the first quarter of 2025.

9. **Financial Position:** Given the substantial financial costs incurred because of the above health / cancer issues, I am currently not able to pay the court ordered legal fees. I have substantial medical fees which are currently not covered by insurance. The only non-retirement assets in my name, currently and during the applicable time period, are two vehicles (a 1994 & 1996) with limited value and a basic operating checking account.
10. **Attempts to Resolve Matters:** I have made efforts to resolve matters, specifically the applicable court ordered fees in the x0382 & x0384 Newberry cases, with opposing parties. These efforts have been directed specifically with attorney Geoffery Chambers and his client Chad Connelly as the primary party in these cases via our legal counsel in a case filed by Chad Connelly against my wife Olga Lisinska and Palmetto Kids FIRST Scholarship Program, Inc. – a 501(c)(3) entity which I am Chairman of the Board. Unfortunately, these efforts have been met with opposition and without success.

It has been my experience with opposing counsel in these two cases that any efforts to resolve issues are rebuffed and communications are completely ignored. I do not believe the opposing parties wish to amicably resolve these matters, and their efforts are solely to embarrass me due to their clients opposing political views and other ulterior motives. **I have heard on many occasions over the past year and a half rumors from Chad Connelly that I am to be arrested and put in jail for not paying these fees timely.**

11. It is my intention to pay the ordered legal fees when able, and I am open to a payment plan (*as minimal as that would have to be at this time*) if the Court so Orders.

I hereby declare under the penalty of perjury that the foregoing is true and correct according to my personal knowledge, and if called as a witness, I could and would testify truthfully about the information contained in this Declaration.

This 11<sup>th</sup> day of October 2024.



---

JEFFERSON DAVIS, JR.  
403 McCarter Avenue  
Greenville, SC 29615  
843-901-8036 (cell)  
*jeff@apogeetax.com*  
PLAINTIFF, *PRO SE*

**EXHIBIT B**

State of South Carolina            )  
                                          ) Court of Common Pleas  
County of Newberry                )

2020-CP-36-00382, 00384

Jefferson Davis, Jr.                )  
                  vs.                    ) Transcript of Record  
                                          )  
                                          )  
Chad Connelly                         )  
                                          )  
                                  Defendant  )

October 11, 2024  
Newberry, South Carolina

B E F O R E:

Honorable Donald B. Hocker, Judge

A P P E A R A N C E S:

Jefferson Davis, Jr.  
Pro se

Justin Novak, Esq.  
Geoffrey Chambers, Esq.  
Attorney for the Defendants

Joy E. Holston  
Official Court Reporter

1 I think that will change the composition of this entire  
2 case for the Court. If you would consider waiting until  
3 that, the resolution of that case in Greenville I think  
4 that would be very helpful.

5 THE COURT: Thank you. Everybody be at ease for just  
6 a moment.

7 Okay, we are back on the record. Mr. Davis, while I  
8 am certainly very sympathetic with your health situation,  
9 you have had to deal with cancer. I am a cancer survivor  
10 myself and I am very sorry you had to deal with that. But  
11 bold statements that you had health issues and therefore  
12 can't pay without any supporting documents from doctors or  
13 whoever to support that, it is hard for me to put much  
14 faith into your statement insofar as allowing that to be a  
15 defense to this contempt action. As to 382, 384 and 93,  
16 the Court orders that you are in wilful constructive civil  
17 contempt of court in violation of prior orders. And you  
18 are hereby sentenced to 90 days incarceration. You can  
19 purge yourself of your contempt citation by paying within  
20 ten days of receipt of the order, and I am going to ask  
21 Mr. Novak, Mr. Chambers to prepare; in 382 to Novak  
22 clients, \$10,007.67 plus fees and cost per a submitted fee  
23 affidavit. And Chambers clients, or client, \$3,440.67  
24 plus fees and cost, bring a contempt action; per a  
25 submitted fee affidavit. In case number 384, the sum of

# EXHIBIT C

October 11, 2024

VIA EMAIL ([dhockersc@sccourts.org](mailto:dhockersc@sccourts.org)) & US Mail

✓ The Honorable Donald B. Hocker  
P.O. Drawer 972  
Laurens, SC 29360

RE: Jefferson Davis Jr vs. Chad Connelly, et al.  
C.A. NO. 2020-CP-36-00382 &  
C.A. NO. 2020-CP-36-00384

Dear Judge Hocker:


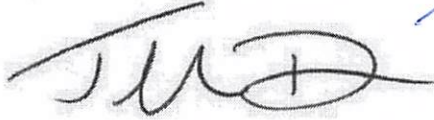
At today's hearing you questioned the truth of my Plaintiff's Declaration & sworn testimony (*and sworn affirmation of the contents of my Plaintiff's Declaration*) as to my medical diagnosis of **Sigmoid Colon Cancer** and the substantial treatment regime I have incurred over the past year and ongoing treatment.

Although you did not request me to provide these documents, please find, **for your In Camera review**, medical records validating my medical condition. **I would request that these documents are sealed**, not for public review, and not placed in the public record given the private, confidential and very sensitive nature of this medical information.

Please accept these documents as additional evidence to demonstrate the fact that I was in a compromised health-related state given the seriousness of my medical condition, and I was not knowingly or willfully in contempt complying with any court orders.

I appreciate your consideration as it may relate to the Courts final order.

Sincerely,



Jeff Davis, JD, MBA, CPA(GA)  
403 McCarter Avenue  
Greenville, SC 29615  
843-901-8036 (cell)  
[jeff@apogeetax.com](mailto:jeff@apogeetax.com)

cc: Newberry Clerk of Court (*via US Mail - without medical records*)  
Justin Novak, Esq. (*via email - without medical records*)  
Geoffery Chambers, Esq. (*via email - without medical records*)

# EXHIBIT D

|                         |   |                                |
|-------------------------|---|--------------------------------|
| STATE OF SOUTH CAROLINA | ) |                                |
|                         | ) | IN THE COURT OF COMMON PLEAS   |
| COUNTY OF NEWBERRY      | ) |                                |
|                         |   |                                |
| JEFFERSON DAVIS, JR.    | ) |                                |
|                         | ) |                                |
| Plaintiff               | ) |                                |
|                         | ) |                                |
| vs.                     | ) | ORDER                          |
|                         | ) | 2020-CP-36-00382 and 384       |
| CHAD CONNELLY, et.al.   | ) | Appellate Case No. 2024-002049 |
|                         | ) |                                |
| Defendant               | ) |                                |
| <hr/>                   |   |                                |

This Order is being issued without a hearing.

The Plaintiff has provided the Court with voluminous medical records pursuant to Court Order of January 23, 2025. Further indication from the Plaintiff is that he has or will undergo chemotherapy for his cancer and may have surgery sometime in the future.

The Court needs to know the anticipated time frame for the completion of the above treatment/surgery including the frequency of chemotherapy treatments and this information needs to come directly from the Plaintiff's treating physician(s). This will assist the Court in determining how matters will



proceed in this case as it relates to the issue of contempt.

Consequently, the Plaintiff shall provide to the Court and opposing counsel a letter/letters from Plaintiff's treating physician(s) providing the above information within fifteen (15) days from the date of this Order.

So Ordered.



---

DONALD B. HOCKER  
CIRCUIT COURT JUDGE

Laurens, South Carolina  
Date: 5-1-25

-2-



**PRIVATE & CONFIDENTIAL**

May 7<sup>th</sup>, 2025

**RE: Medical Condition for Ronald Jefferson Davis, Jr.**  
**DOB: May 12<sup>th</sup>, 1967**

To Whom It May Concern,

Mr. Ronald Jefferson Davis is under my care for treatment of Stage IV Sigmoid Colon Cancer. Please allow this letter to provide information regarding Mr. Davis's current treatment and treatment plan and to provide my professional recommendation regarding activities and restrictions during this course of treatment.

Mr. Davis has been scheduled for four chemotherapy treatments in 2025 on the following dates: April 22-25 (*completed*), May 6-9 (*in process*), May 20-23, and June 3-9. These initial treatments may be supplemented with additional chemotherapy, if and as needed. These chemotherapy treatments are timed and scheduled (as well as his recovery from such) to prepare him for a scheduled major surgery on July [REDACTED] 2025, with an anticipated 6-day hospital stay, followed by necessary recovery time and follow-up appointments.

Mr. Davis's treatments and surgery require the care of at least one additional individual, and I understand that these services have been (and will be) provided by his spouse.


During this period, Mr. Davis should avoid activities including work, exercise, and other strenuous activities. I am further informed that this letter has been requested in relation to a court matter, which may go for multiple days. To the extent it is possible, it is my strong recommendation that Mr. Davis seek to reschedule court appearances and similar engagements during the course of the above treatment and recovery.

I expect that Mr. Davis's recovery may extend into September, but that Mr. Davis would likely be able to reengage in most activities by October 1, 2025.

Should you require further information or documentation, please do not hesitate to contact my office.

Sincerely,

[REDACTED]  
Title: MD



May 6, 2025

To Whom It May Concern,

Ronald Davis date of birth May [REDACTED] 1967, is my patient that is being treated for Adenocarcinoma of Sigmoid Colon. He is currently on a chemotherapy treatment that began on April 22, 2025, and hopefully be completed on November 21, 2025. Mr. Davis is currently not working due to weakness, fatigue, compromised immune system, loss of appetite and nausea. I anticipate full recovery by the new year.

If more information is needed, please contact my office.

Thank you,



# EXHIBIT G - DR. [REDACTED]

PRIVATE & CONFIDENTIAL

May 7<sup>th</sup>, 2025

**RE: Medical Condition for Ronald Jefferson Davis, Jr.**  
**DOB: May 12<sup>th</sup>, 1967**

To Whom It May Concern,

Mr. Ronald Jefferson Davis is under my care for treatment of Stage IV Sigmoid Colon Cancer. Please allow this letter to provide information regarding Mr. Davis's current treatment and treatment plan and to provide my professional recommendation regarding activities and restrictions during this course of treatment.

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Mr. Davis's treatments and surgery require the care of at least one additional individual, and I understand that these services have been (and will be) provided by his spouse.

During this period, Mr. Davis should avoid activities including work, exercise, and other strenuous activities. I am further informed that this letter has been requested in relation to a court matter, which may go for multiple days. To the extent it is possible, it is my strong recommendation that Mr. Davis seek to reschedule court appearances and similar engagements during the course of the above treatment and recovery.

I expect that Mr. Davis's recovery may extend into September, but that Mr. Davis would likely be able to reengage in most activities by 9/15, 2025.

Should you require further information or documentation, please do not hesitate to contact my office [REDACTED]

# EXHIBIT H - DR. [REDACTED]

**PRIVATE & CONFIDENTIAL**

May 7<sup>th</sup>, 2025

**RE: Medical Condition for Ronald Jefferson Davis, Jr.**  
**DOB: May 12<sup>th</sup>, 1967**

To Whom It May Concern,

Mr. Ronald Jefferson Davis is under my care for treatment of Stage IV Sigmoid Colon Cancer. Please allow this letter to provide information regarding Mr. Davis's current treatment and treatment plan and to provide my professional recommendation regarding activities and restrictions during this course of treatment.

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Mr. Davis's treatments and surgery require the care of at least one additional individual, and I understand that these services have been (and will be) provided by his spouse.

During this period, Mr. Davis should avoid activities including work, exercise, and other strenuous activities. I am further informed that this letter has been requested in relation to a court matter, which may go for multiple days. To the extent it is possible, it is my strong recommendation that Mr. Davis seek to reschedule court appearances and similar engagements during the course of the above treatment and recovery.

I expect that Mr. Davis's recovery may extend into September, but that Mr. Davis would likely be able to reengage in most activities by Sept 15, 2025.

Should you require further information or documentation, please do not hesitate to contact my office.

Sincerely,  
[REDACTED]

Title: MD

RECEIVED

May 28 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.

PROOF OF SERVICE

I certify that I have served Appellant’s **STATUS UPDATE** on the below named parties  
via First Class Mail **or email** on **May 27<sup>th</sup>, 2025**.

[CONTINUED ON NEXT PAGE.]

M. Dawes Cooke, Jr., Esq. & Justin Paul Novak, Esq.  
Barnwell Whaley  
P.O. Drawer H, Charleston SC 29402  
*mdc@barnwell-whaley.com*  
*jnovak@barnwell-whaley.com*  
(843) 577-7700

**Connelly, Wilson, Persons & Mellen**

Douglas Walker MacKelcan, III, Esq. & Skyler C. Wilson, Esq.  
Carlock, Copeland & Stair, LLP  
40 Calhoun St., Ste. 400, Charleston SC 29401  
*dmackelcan@cskl.law*  
*swilson@cskl.law*  
**Stephen D. Kirkland, CPA, CMA**

Jessica E. Kinard, Esq.  
Law Offices of Jessica E. Kinard  
PO Box 667  
Columbia, SC 29202  
*jessica.kinard@columbiasc.gov*  
**John Doe #1 / Anonymous (JeffDavisFIRST.com website)**

Benjamin T Coppage, Esq.  
Coppage Law Firm, LLC  
1010 Carteret St.  
Beaufort SC 29902  
*ben@coppagelawfirm.com*  
(843) 379-9601  
**John Doe #2**

Geoffrey Chambers, Esq.  
CPER Law Group, LL  
411 Walnut Street #10646  
Green Cove Springs, FL 32043  
*g.k.chambers@gmail.com*  
*geoffrey@cperlgroup.com*  
(864) 508-0899  
**Non-Party - Educational Credit For Exceptional Needs  
Children Fund (ECENC Fund, aka Exceptional SC)**

[CONTINUED ON NEXT PAGE.]

Jasmine Denise Smith, Esq. &  
Calhoun J. Watson, Esq.  
Robinson Gray  
PO Box 11449  
Columbia, SC 29211  
*jsmith@robinsongray.com*  
*cwatson@robinsongray.com*  
**E3 Software**

Susie Jean Lloyd, Esq. &  
Harper S Seldin, Esq.  
Cozen O'Connor  
301 S. College St., Suite 3400  
Charlotte NC 28202  
**Endurance International**



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