

**RECEIVED**

**Jul 31 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.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

NOW COME *Pro Se* Appellant above named, on the grounds stated below, and, pursuant  
to Rules 208, 240 and 263 of the South Carolina Appellate Court Rules, hereby move this

Honorable Court to allow him an extension until **Monday, November 17<sup>th</sup>, 2025**, to file / serve his initial brief and designation of matter to be included in the record on appeal.

1. As the Court of Appeals is aware (see **Status Update #5 filed May 27<sup>th</sup>, 2025 & attached Sworn Affidavit with redacted Doctors letters**), Appellant has **Stage IV colon cancer** (recurrence) and recently completed four rounds of extensive chemotherapy followed by major surgery on **June 30<sup>th</sup>, 2025**.
2. Appellant has provided extensive medical documentation as well as letters from his medical professionals to the trial court in this case, which in turn has placed a temporary stay in the underlying proceedings **“until the next hearing to be scheduled sometime in November 2025”**. See Order dated May 29, 2025.
3. This request is for extraordinary circumstances.
4. This request is made in good faith and not for purposes of delay.

WHEREFORE, the undersigned would respectfully request an **extension until Monday, November 17<sup>th</sup>, 2025** in which to file / serve his initial brief and designation of matter to be included in the record on appeal.



Date: July 31<sup>st</sup>, 2025

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Jefferson Davis, Jr., Appellant  
403 McCarter Avenue,  
Greenville, SC 29615  
843-901-8036 (cell) | [jeff@apogetax.com](mailto:jeff@apogetax.com)

Other Counsel / Parties of Record: See Certificate of Service

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PROOF OF SERVICE

I certify that I have served **APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER** on the below named parties via First Class Mail or email on **July 31<sup>st</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