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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

Appellate Case No. 2024-002049
Civil Action Nos. 2020-CP-36-00382 & 00384

Jefferson Davis, Jr. Appellant,

v.

Chad Connelly, Dave Wilson, Stephen 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, Geoffrey Chambers, Esq., and South Carolina
Educational Credit for Exceptional Needs Children Fund Respondents.

**RESPONDENTS CHAD CONNELLY, DAVE WILSON, TOM PERSONS, AND
NEIL MELLEN’S RETURN TO APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND
SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondents Chad Connelly, Dave Wilson, Tom Persons, and Neil Mellen (“Respondents”) hereby respond to Appellant’s Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter requesting that this Court deny Appellant’s motion for the same reasons this Court no longer held this appeal in abeyance in its letter dated June 13, 2025. In the motion, Appellant requests an extension of time to file and serve the initial brief and designation of matter in this appeal until November 17, 2025, which is almost one (1) year from the filing of the notice of appeal on December 2, 2024, and one hundred and nine (109) days from

the July 31, 2025, deadline set by this Court on July 1, 2025. This Court should deny Appellant's request for the same reasons this Court no longer held this appeal in abeyance in its letter dated June 13, 2025.

Respectfully submitted,

s/Justin P. Novak _____
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August 11, 2025