

RECEIVED

Oct 08 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.

MOTION TO WITHDRAW AS COUNSEL

Jasmine D. Smith, Esquire, of Robinson Gray Stepp & Laffitte, LLC, counsel for Respondent E3 Software, LLC hereby moves the Court for leave to withdraw as counsel for Defendant E3 Software, LLC. In support of this motion, Ms. Smith states as follows:

1. Ms. Smith will be ending her employment with Robinson Gray Stepp & Laffitte, LLC effective October 14, 2025, and will no longer be involved in this case.

2. Defendant E3 Software, LLC will not be prejudiced by granting this request, and the requested withdrawal will not cause material adverse effect on the Defendant E3 Software, LLC's interests because attorney J. Calhoun Watson of Robinson Gray Stepp & Laffitte, LLC will continue representing Defendant E3 Software, LLC.

3. Granting this request will not cause any delay in this matter.

Accordingly, the undersigned respectfully requests that the Court grant this motion for withdrawal of Jasmine D. Smith as counsel.

ROBINSON GRAY STEPP & LAFFITTE, LLC

BY: s/Jasmine D. Smith

J. Calhoun Watson (SC Bar No. 10089)

cwatson@robinsongray.com

Jasmine D. Smith (SC Bar No. 100758)

jsmith@robinsongray.com

2151 Pickens Street, Suite 500

Post Office Box 11449

Columbia, SC 29211

Tel: 803-929-1400

Columbia, South Carolina
October 8, 2025

RECEIVED

Oct 08 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

Pursuant to Rule 262(c)(3), SCACR, I certify that I have caused the **MOTION TO WITHDRAW** to be served on the following counsel of record by AIS email at the following addresses:

Jefferson Davis, Jr.
403 McCarter Avenue
Greenville, SC 29615
jeff@apogeetax.com
Pro Se Appellant

Douglas W. Mackelcan, Esquire
Skyler C. Wilson, Esquire
Copeland, Stair, Kingma & Lovell, LLP 40
Calhoun Street, Suite 400
Charleston, SC 29401-3531
Phone: (843) 727-0307
E-mail: dmackelcan@cskl.law
E-mail: swilson@cskl.law
Attorneys for Defendant, Stephen Kirkland

Jessica E. Kinard, Esquire
Law Offices of Jessica E. Kinard
PO BOX 667
Columbia, SC 29202
jessica.kinard@columbiasc.gov
Attorneys for John Doe #1

Benjamin Terrell Coppage, Esquire
Coppage Law Firm, LLC
1010 Carteret St.
Beaufort, SC 29902
ben@coppagelawfirm.com
Phone: (843) 379-9601
Attorneys for John Doe #2

M. Dawes Cooke, Jr. Esquire
Justin P. Novak, Esquire
Barnwell Whaley Patterson & Helms, LLC
P.O. Drawer H
Charleston, SC 29402
mdc@barnwell-whaley.com
jnovak@barnwell-whaley.com
***Attorneys for Respondents Chad Connelly,
Tom Persons, Dave Wilson, and Neil
Mellen***

Susie Lloyd, Esquire
COZEN O'CONNOR
301 South College Street, Suite 2100
Charlotte, NC 28202
slloyd@cozen.com
***Attorneys for Endurance International
Group Holdings, Inc.***

Geoffrey Kelly Chambers, Esquire
CPER Law Group, LLC
411 Walnut Street #10646
Green Cove Springs, FL 32043
Phone: (864) 508-0899
g.k.chambers@gmail.com
geoffrey@cperlgroup.com
***Attorneys for Respondent Geoffrey
Chambers, Esquire and South Carolina
Credit for Exceptional Children Fund***

ROBINSON GRAY STEPP & LAFFITTE, LLC

BY: *s/Jasmine D. Smith*

J. Calhoun Watson (SC Bar No. 10089)

cwatson@robinsongray.com

Jasmine D. Smith (SC Bar No. 100758)

jsmith@robinsongray.com

2151 Pickens Street, Suite 500

Post Office Box 11449

Columbia, SC 29211

Tel: 803-929-1400

Columbia, South Carolina

October 8, 2025