

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Dec 08 2025**

**SC Court of Appeals**

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Hon. Donald B. Hocker, Circuit Court Judge

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C.A. No.: 2020-CP-36-00382 &  
C.A. No.: 2020-CP-36-00384  
Appellate Case No 2024-002049

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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.

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**APPELLANT’S 2<sup>ND</sup> MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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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 **Tuesday, March 31<sup>st</sup>, 2026**, 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 completed four rounds of extensive chemotherapy (April, May & June, 2025) 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, and the trial court has finally conceded and acknowledged that Appellant does in fact have Stage IV colon cancer as Appellant had previously attested. See Order dated May 29, 2025.
3. Following Appellant's four rounds of extensive chemotherapy and major surgery on June 30<sup>th</sup>, 2025, Appellant has been advised and is currently receiving additional extensive chemotherapy treatments (8 total expected). See attached Declaration dated December 8<sup>th</sup>, 2025.
4. Appellant's most recent extensive chemotherapy treatment (#4 in the expected cycle of 8) was on Wednesday December 3<sup>rd</sup>, 2025, and he has scheduled treatments on December 17<sup>th</sup>, 31<sup>st</sup>, January 14<sup>th</sup> & 28<sup>th</sup>, 2026. See attached Declaration dated December 8<sup>th</sup>, 2025.
5. Additional testing following the current cycle of chemotherapy will determine further course of treatments. See attached Declaration dated December 8<sup>th</sup>, 2025.

6. Appellant expects best case a minimum of two months recovery time following this current cycle of chemotherapy. See attached Declaration dated December 8<sup>th</sup>, 2025.
7. This request is for extraordinary circumstances.
8. This request is made in good faith and not for purposes of delay.

WHEREFORE, the undersigned would respectfully request an **extension until Tuesday, March 31<sup>st</sup>, 2026** in which to file / serve his initial brief and designation of matter to be included in the record on appeal.



Date: December 8<sup>th</sup>, 2025

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

Other Counsel / Parties of Record: See Certificate of Service

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*and*

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PROOF OF SERVICE

I certify that I have served **APPELLANT’S 2<sup>ND</sup> 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 **December 8<sup>th</sup>, 2025**.

[CONTINUED ON NEXT PAGE.]

M. Dawes Cooke, Jr., Esq. & Justin Paul Novak, Esq.  
Barnwell Whaley  
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(843) 577-7700

**Connelly, Wilson, Persons & Mellen**

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**Stephen D. Kirkland, CPA, CMA**

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**John Doe #1 / Anonymous (JeffDavisFIRST.com website)**

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**John Doe #2**

Geoffrey Chambers, Esq.  
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411 Walnut Street #10646  
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**Non-Party - Educational Credit For Exceptional Needs  
Children Fund (ECENC Fund, aka Exceptional SC)**

[CONTINUED ON NEXT PAGE.]

Calhoun J. Watson, Esq.  
Robinson Gray  
PO Box 11449  
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**E3 Software**

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

A handwritten signature in blue ink, appearing to read 'J. Davis', with a horizontal line drawn below it.

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

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**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* Appellant in the above captioned appeals, and I am a resident and elector of Greenville County, South Carolina.

3. Appellant has Stage IV colon cancer.
4. In addition to the extensive surgery and chemotherapy treatments previously documented with the Court, Appellant has most recently completed four (4) rounds of extensive chemotherapy on October 21<sup>st</sup>, November 5<sup>th</sup>, November 19<sup>th</sup> & December 3<sup>rd</sup>, 2025.
5. Appellant has four (4) additional rounds of extensive chemotherapy scheduled for December 17<sup>th</sup>, 31<sup>st</sup>, January 14<sup>th</sup> & 28<sup>th</sup>, 2026.
6. Each round of chemotherapy is a full day infusion of approximately 7 hours.
7. Appellant expects best case a minimum of two months recovery time following this current cycle of chemotherapy.
8. Additional testing following the current cycle of chemotherapy will determine further course of treatments.

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 8<sup>th</sup> day of December 2025.

A handwritten signature in blue ink, appearing to read 'J. Davis', written over a horizontal line.

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

December 8<sup>th</sup>, 2025

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**SC Court of Appeals**

**VIA Email & US Mail**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Appellate Case No 2024-002049 – \$50 FILING FEE**

Dear Ms. Kitchings:

Please find enclosed the \$50 filing fee for **APPELLANT'S 2<sup>ND</sup> MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER** filed by email earlier today.

Thank you for your assistance. If you have any questions, please feel free to email me at [jeff@apogeetax.com](mailto:jeff@apogeetax.com) or give me a call at 843-901-8036 (cell).

Sincerely,



Jeff Davis, *JD, MBA, CPA(GA)*

Plaintiff / Appellant

403 McCarter Avenue, Greenville, SC 29615

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