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Dec 16 2025

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 2<sup>ND</sup> 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 2<sup>ND</sup> 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 March 31, 2026, which is more than one (1) year from the filing of the notice of appeal on December 2, 2024, and two hundred and forty three (243) 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* \_\_\_\_\_

M. Dawes Cooke, Jr., Esquire

Justin P. Novak, Esquire

Barnwell Whaley Patterson & Helms, LLC

P.O. Drawer H

Charleston, South Carolina 29402

Phone: (843) 577-7700

Fax: (843) 577-7708

[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)

[jnovak@barnwell-whaley.com](mailto:jnovak@barnwell-whaley.com)

***Attorneys for Respondents Chad Connelly,  
Dave Wilson, Tom Persons, and Neil Mellen***

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**PROOF OF SERVICE**

I, the undersigned employee of Barnwell Whaley Patterson & Helms, LLC, herby certify that pursuant to Rules 240 and 262(b), SCACR, I have served the ***Respondents Chad Connelly, Dave Wilson, Tom Persons, and Neil Mellen's Return to Appellant's 2<sup>nd</sup> Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter*** in this matter upon the Clerk of the South Carolina Court of Appeals, all counsel of record, and all pro se parties by electronic mail on December 16, 2025, to the following addresses:

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Email: ctappfilings@sccourts.org

Douglas Walker MacKelcan, III  
Skyler C. Wilson  
Copeland Stair Valz & Lovell, LLP  
40 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
Email: dmackelcan@csvl.law  
Email: swilson@csvl.law

Geoffrey Chambers  
CPERL Group, LLC  
411 Walnut Street #10646  
Green Cove Springs, FL 32043  
Email: g.k.chambers@gmail.com  
Email: geoffrey@cperlgroup.com

Jasmine D. Smith  
Cal Watson  
Robinson Gray  
2151 Pickens Street, Suite 500  
Columbia, South Carolina 29201  
Email: jsmith@robinsongray.com  
Email: cwatson@robinsongray.com

Jefferson Davis, Jr.  
403 McCarter Avenue  
Greenville, South Carolina 29615  
Email: jeff@apogeetax.com

Jessica E. Kinard  
Law Offices of Jessica E. Kinard  
PO Box 667  
Columbia, South Carolina 29202  
Email: jessica.kinard@columbiasc.gov

Benjamin T. Coppage  
Coppage Law Firm, LLC  
1010 Carter Street  
Beaufort, South Carolina 29902  
Email: ben@coppagelawfirm.com

*/s Anthony Baglivo*

Anthony Baglivo

December 16, 2025