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**Mar 31 2026**

**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

I certify that I have served **INITIAL REPLY OF APPELLANT and APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** on the below named parties via First Class Mail or email on **March 31<sup>st</sup>, 2026**.

[CONTINUED ON NEXT PAGE.]

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**Non-Party - Educational Credit For Exceptional Needs  
Children Fund (ECENC Fund, aka Exceptional SC)**

[CONTINUED ON NEXT PAGE.]

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A handwritten signature in blue ink, appearing to read "JD", with a horizontal line underneath it.

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March 31<sup>st</sup>, 2026

*VIA Email Only (ctappfilings@sccourts.org)*

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

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**RE: Appellate Case No 2024-002049**

Dear Ms. Kitchings:

Please find attached the original of the following for the above referenced matter.

- 1. Initial Brief of Appellant**
- 2. Appellants' Designation of Matter to be Included in the Record on Appeal**
- 3. Proof of Service**

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,



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