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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.

**APPELLANT’S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

NOW COMES *Pro Se* Appellant Jefferson Davis, Jr., and pursuant to Rules 209 and 210
of the South Carolina Appellate Court Rules (SCACR), hereby designates the following matters
to be included in the Record on Appeal:

NOTE: This Designation is limited to those matters necessary to review whether the circuit court erred in finding willful civil contempt where Appellant demonstrated an inability to pay the ordered attorney fees due to serious medical condition and resulting financial incapacity.

Appellant does not contest the underlying award of attorney fees in this appeal.

ORDERS

1. **ORDER OF CIVIL CONTEMPT filed November 25th, 2024. (Hon. Donald B. Hocker)** Requiring 90-days in jail even though Appellant demonstrated an inability to pay the ordered attorney fees due to serious medical condition and resulting financial incapacity; and Appellant's offer of a payment plan.

PLEADINGS, MOTIONS & MEMORANDA

2. Declaration of Jefferson Davis, Jr. filed October 11th, 2024.

ORDERS - ON REMAND

3. **ORDER FROM THE SC COURT OF APPEALS** filed on December 20th, 2024.
4. **ORDER #1** (*dated January 23rd, 2025*) filed January 27th, 2025. (Hon. Donald B. Hocker) Staying enforcement, requiring medical records to support claim of Stage IV Colon Cancer, and sealing such records.
5. **ORDER #2** filed May 1, 2025. (Hon. Donald B. Hocker) Requiring written letters within 15 days from Appellants medical providers confirming his serious medical condition and detailing when Appellant would be available for court hearings due to his 1st relapse of Stage IV Colon Cancer.
6. **ORDER #3** (*dated May 29th, 2025*) filed June 3rd, 2025. (Hon. Donald B. Hocker) Staying proceedings until November 2025 due to Appellants now proven 1st relapse of Stage IV Colon Cancer.
7. **ORDER #4** (*dated January 18th, 2026*) filed January 28th, 2026. (Hon. Donald B. Hocker) Requiring Appellant to obtain **sworn affidavits by Feb 19th, 2026** (not just

letters as before) from his medical providers due to the Court's disbelief of Appellants 2nd relapse of Stage IV Colon Cancer.

8. **ORDER #5** filed February 25th, 2026. (Hon. Donald B. Hocker) Granting Writ of Supersedeas six days after receiving a *sworn medical affidavit* from Appellant's treating oncologist confirming in extensive detail (as ordered) the 2nd relapse of Appellant's Stage IV Colon Cancer.
9. **ORDER Altering Fifth Order** filed March 27th, 2026. Respondents filed a Motion to Reconsider ORDER #5 which the Court granted by amending the Writ of Supersedeas to now require a \$50,000 bond which is unattainable as Appellant has demonstrated an inability to pay the ordered attorney fees due to serious medical condition and resulting financial incapacity.

PLEADINGS, MOTIONS & MEMORANDA – ON REMAND

10. Defendants' Joint Motion for Expedited Discovery filed on December 23rd, 2024.
11. Appellants Memorandum in Response to Defendants' Joint Motion for Expedited Discover (*dated January 14th, 2025*) filed January 27th, 2025
12. Copy of Email (dated January 14th, 2025) filed January 27th, 2025.
13. Documents Under Seal filed March 31, 2025. (Medical Records – Feb 23, 2025 & March 4th, 2025)
14. Reply/Reply Memorandum on Behalf of Defendants filed April 7th, 2025.
15. Documents Under Seal (dated February 19th, 2026) filed February 24th, 2026. Appellants Sworn Declaration and Doctors Sworn Affidavit.
16. Respondents Amended Motion to Reconsider, Alter, or Amend Fifth Order filed March 6th, 2026.
17. Plaintiff's Return on Opposition to Respondents' Amended Motion to Reconsider, Alter, or Amend Fifth Order (dated March 16th, 2026) filed March 24th, 2026.

TRANSCRIPTS

18. Transcript of October 11th, 2024, Rule to Show Cause Hearing. Includes sworn testimony from Appellant as to his serious medical condition and resulting financial incapacity; and documents Appellant's offer of a payment plan.

OTHER DOCUMENTS

19. All emails between the Court / Hon. Donald B. Hocker and the parties / legal counsel.
20. Any future filings at the trial court level due to the remand.

Appellant certifies that this Designation contains no matter that is irrelevant to this appeal.

A handwritten signature in blue ink, appearing to read "J.D.", is positioned above a horizontal line.

Date: March 31st, 2026

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