

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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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 SUPPLEMENTAL NOTICE OF EVIDENCE  
AND REQUEST FOR CONSIDERATION**

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**NOW COMES** *Pro Se* Appellant Jefferson Davis, Jr., and respectfully files this  
Supplemental Notice of Evidence in connection with his pending Motion for Reconsideration and

for Further Relief (filed April 23, 2026) and his pending Motion to Seal Confidential Medical Records (filed March 31, 2026).

### **Supplemental Evidence**

On April 21, 2026, Appellant underwent a Signatera ctDNA blood test. The result, received on April 28, 2026, **shows a positive reading, confirming recurrence of Appellant's Stage IV colon cancer.**

This new evidence further demonstrates that Appellant's health remains in a **very guarded state** and directly supports the irreparable harm that would result from any enforcement of the contempt order or the \$50,000 bond requirement. Appellant is now expected to undergo an aggressive treatment regimen going forward, which will materially limit his availability as a *pro se* litigant. Appellant is prepared to provide the full current medical records, including this latest Signatera result and any additional documentation previously submitted to the circuit court, under seal for the Court's review if desired.

Appellant respectfully requests that this Supplemental Evidence be considered in connection with his pending Motion for Reconsideration, the pending Motion to Seal, and any further proceedings in this appeal. **Appellant also requests that this evidence (and all related medical records) be maintained under seal consistent with his pending Motion to Seal.**

**[CONTINUED ON NEXT PAGE]**

**WHEREFORE**, Appellant respectfully requests that the Court:

- 1) Consider this Supplemental Evidence in connection with all pending motions;
- 2) Rule on the pending Motion to Seal at its earliest convenience; and
- 3) Grant such other relief as the Court deems just and proper.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J.D.', with a stylized flourish extending to the right.

Date: April 29, 2026

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Jefferson Davis, Jr., Appellant  
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RECEIVED

Apr 29 2026

SC Court of Appeals

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PROOF OF SERVICE

I certify that I have served **APPELLANT’S SUPPLEMENTAL NOTICE OF EVIDENCE AND REQUEST FOR CONSIDERATION** on the below named parties via First Class Mail and / or email on **April 29, 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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