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Apr 30 2026

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, NEIL MELLEN,
GEOFFREY CHAMBERS, ESQ., AND SOUTH CAROLINA EDUCATIONAL CREDIT FOR
EXCEPTIONAL NEEDS CHILDREN FUND’S NOTICE REGARDING INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Appellant filed the Initial Brief of Appellant and Appellant’s Designation of Matter to be Included in the Record on Appeal on March 31, 2026, pursuant to this Court’s Order granting Appellant’s motion for an extension of time to serve and file the initial brief and designation of

matter for inclusion in the record on appeal filed on February 5, 2026. Accordingly, the South Carolina Appellate Court Rules require Respondents Chad Connelly, Dave Wilson, Tom Persons, Neil Mellen, Geoffrey Chambers, Esq., and South Carolina Educational Credit for Exceptional Needs Children Fund (“Respondents”) to serve and file the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal on or before April 30, 2026.

On April 23, 2026, however, Appellant filed Appellant’s Notice of Bankruptcy Filing & Automatic Stay notifying the Court and all parties that Appellant has filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of South Carolina, captioned In re Ronald Jefferson Davis, Jr., Case No. 26-01761-hb. Accordingly, unless the Court instructs them to do otherwise, Respondents will not serve and/or file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal at this time, in compliance with 11 U.S.C. § 108(c).

Respectfully submitted,

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Exceptional Needs Children Fund*

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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, Neil Mellen Geoffrey Chambers, Esq., and South Carolina Educational Credit for Exceptional Needs Children Fund's Notice Regarding Initial Brief and Designation of Matter to be Included in Record on Appeal** 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 April 30, 2026, to the following addresses:

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Clerk, South Carolina Court of Appeals
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/s Justin P. Novak
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April 30, 2026