

RECEIVED

Oct 20 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 THIRD STATUS UPDATE

On May 5th, 2026, the Clerk provided a letter stating that this matter will be held in
abeyance due to the bankruptcy of one of the parties and directed the Appellant to provide the
Court with a status update every sixty (60) days.

On June 30th, 2026, Appellant filed his initial Status Update.

On July 30th, 2026, the Clerk provided a letter acknowledging receipt of Appellant's June 30th, 2026, Status Update. The letter further directed Appellant to notify the Court once he is discharged from bankruptcy or upon the expiration of thirty days.

On August 30th, 2026, Appellant filed his Second Status Update.

The following is Appellant's third required Status Update:

APPELLANT'S CHAPTER 7 BANKRUPTCY – MAIN CASE:

- Please find attached as **Exhibit 01** the bankruptcy court docket as of October 20th, 2026.
- On September 6th, 2026, Respondent Geoffrey Chambers filed a Notice of Appearance.
- No other action has been taken in the main bankruptcy case.

RESPONDENT'S BANKRUPTCY ADVERSARY PROCEEDING (filed 7/20/2026):

- On July 20th, 2026, Respondents in this matter filed an Adversary Proceeding (26-80039) in Appellant's Chapter 7 Bankruptcy Case apparently seeking to have the legal fees in this Court of Appeals matter ruled nondischargeable.
- Please find attached as **Exhibit 02** the adversary case docket as of October 20th, 2026.
- On September 6th, 2026, Respondent Geoffrey Chambers filed a Notice of Appearance.
- On September 7th, 2026, the parties filed a proposed CONSENT ORDER RESOLVING SERVICE AND GRANTING EXTENSION OF TIME TO RESPOND TO COMPLAINT.

- On September 8th, 2026, the Bankruptcy Court issued its Order Resolving Repsondent's Service issues and setting the deadline for Appellant's response to September 21st, 2021.
See Exhibit 03.
- On September 21st, 2026, Appellant timely filed his MOTION TO DISMISS COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6) AND MEMORADUM OF LAW.
- On September 24th, 2026, the Bankruptcy Court issued its Order Scheduling Deadlines. The Order specifically states: "Any responses or objections to the Motion should be filed **no later than October 14, 2026.**" (Bolding is used in the Order.) **See Exhibit 04.**
- No responses or objections to the 12(b)(6) Motion to Dismiss were filed by Respondents.
- On October 16th, 2026, Appellant filed his REQUEST FOR RULING ON THE PAPERS noting that "*[t]he arguments set forth in the Motion to Dismiss stand uncontroverted.*"

UNDERLYING SOUTH CAROLINA CIRCUIT COURT CASES:

- As of today, October 20th, 2026, there has been no further action from the circuit court as the parties await further direction.

Respectfully submitted,



Date: October 20th, 2026

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

EXHIBIT 01

**United States Bankruptcy Court
District of South Carolina (Greenville)
Bankruptcy Petition #: 26-01761-eg**

MEANSU, DeBN, 523

Assigned to: Judge Elisabetta G.M. Gasparini
Chapter 7
Voluntary
No asset

Date filed: 04/23/2026
341 meeting: 05/19/2026
Deadline for objecting to discharge: 07/20/2026
Deadline for financial mgmt. course: 07/20/2026

Debtor

Ronald Jefferson Davis, Jr
403 McCarter Avenue
Greenville, SC 29615
GREENVILLE-SC
843-901-8036
SSN / ITIN: xxx-xx-8220
aka Jeff Davis

represented by **Ronald Jefferson Davis, Jr**
PRO SE

Trustee

John K Fort
John K Fort, Chapter 7 Trustee
PO Box 669
29356
Landrum, SC 29356
864-702-8113

U.S. Trustee

US Trustee's Office
Strom Thurmond Federal Building
1835 Assembly St.
Suite 953
Columbia, SC 29201

Filing Date	#	Docket Text
04/23/2026	<u>1</u> (10 pgs)	Chapter 7 Voluntary Petition - Individual Case was received at the window. Filed by Ronald Jefferson Davis, Jr . (Montgomery, S) (Entered: 04/23/2026)
04/23/2026	2	Bankruptcy Form 121 SSN. Filed by Ronald Jefferson Davis, Jr . (Montgomery, S) (Entered: 04/23/2026)
04/23/2026	<u>3</u> (1 pg)	Certificate of Credit Counseling Filed by Ronald Jefferson Davis, Jr . (Montgomery, S) (Entered: 04/23/2026)
04/23/2026	4	Filer Identification- Party filing document: Debtor. re: Voluntary Petition (Chapter 7) (related document(s) <u>1</u>) (Montgomery, S) (Entered: 04/23/2026)

		04/23/2026)
04/23/2026	5 (2 pgs)	Application to Pay Filing Fee in Installments. Filed by Ronald Jefferson Davis, Jr. (Montgomery, S) (Entered: 04/23/2026)
04/23/2026	6 (3 pgs; 2 docs)	Notice of Chapter 7 Bankruptcy Case, Meeting of Creditors & Notice of Appointment of Interim Trustee with a 341(a) meeting to be held on 5/19/2026 at 11:30 AM at Zoom Fort: Meeting ID: 625 615 9574 Passcode: 2229211799 Telephone: 1-864-659-7096. Last day to oppose discharge or dischargeability is 7/20/2026.. Document served. (Entered: 04/23/2026)
04/23/2026	7	Debtor's Request to Activate Electronic Noticing. DOCUMENT IMAGE AVAILABLE ONLY TO COURT USERS AND THE TRUSTEE/US TRUSTEE. Filed by Ronald Jefferson Davis, Jr. (Montgomery, S) (Entered: 04/23/2026)
04/23/2026		Receipt of Chapter 7 Filing Fee(installments) - \$100.00 by SM. Receipt Number 301895. (admin) (Entered: 04/23/2026)
04/23/2026	9 (3 pgs; 2 docs)	Notice of Filings Due: Summary of Assets and Liabilities due 5/7/2026. Declaration About an Individual Debtors Schedules due 5/7/2026. Schedule A/B due 5/7/2026. Schedule C due 5/7/2026. Schedule D due 5/7/2026. Schedule E/F due 5/7/2026. Schedule G due 5/7/2026. Schedule H due 5/7/2026. Schedule I due 5/7/2026. Schedule J due 5/7/2026. Statement of Financial Affairs due 5/7/2026.Chapter 7 Stmt of Income/Mean Test Due: 5/7/2026. Copies of Payment Advices due by 5/7/2026. Incomplete Filings due by 5/7/2026. Statement of Intent due 5/19/2026. (Emory, Catherine) (Entered: 04/24/2026)
04/24/2026	8 (10 pgs; 4 docs)	Pro Se Letter of Instruction with Attachments (Related Document # 1). (ADI) (Entered: 04/24/2026)
04/24/2026		Judge Elisabetta G.M. Gasparini added to case. Involvement of Judge Helen E. Burris ended. (Maxwell, Lauren) (Entered: 04/24/2026)
04/24/2026		Installment Payment - INITIAL of \$100.00 Receipted on 4/23/2026. Balance Due: \$213.00. (Montgomery, S) (Entered: 04/24/2026)
04/25/2026	10 (4 pgs)	Certificate of Service of Meeting of Creditors Notice as served by the Bankruptcy Noticing Center. Notice Date 04/25/2026. (Related Doc # 6) (Admin.) (Entered: 04/26/2026)
04/26/2026	11 (3 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 04/26/2026. (Related Doc # 9) (Admin.) (Entered: 04/27/2026)
04/26/2026	12 (5 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 04/26/2026. (Related Doc # 8) (Admin.) (Entered: 04/27/2026)
05/07/2026	14 (54 pgs)	Schedules Filed: Summary of Assets and Liabilities Schedule A/B Schedule C Schedule D Schedule E/F Schedule G Schedule H Schedule I Schedule J Declaration About an Individual Debtors Schedules; Statements Filed: Statement of Financial Affairs Statement Disclosing Anticipated Increase in Income or Expenditures Creditor Matrix Statement

		of Current Monthly Income Ch 7 Means Test Calculation for an Individual Filed by Ronald Jefferson Davis, Jr . (Montgomery, S) (Entered: 05/07/2026)
05/07/2026	15 (2 pgs; 2 docs)	Order Granting Application To Pay Filing Fees In Installments. Initial Fee Paid: 100.00. Amount of Second Payment: 80.00. Amount of Third Payment: 80.00. Amount of Fourth Payment: 78.00. Document Served. (Related Doc # 5). Second Installment Payment due by 6/8/2026. Third Installment Payment due by 7/6/2026. Fourth Installment Payment due by 8/5/2026. Installment Payment Review Deadline 8/5/2026. (Montgomery, S) (Entered: 05/07/2026)
05/09/2026	16 (2 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 05/09/2026. (Related Doc # 15) (Admin.) (Entered: 05/10/2026)
05/19/2026		Meeting of Creditors Held and Examination of Debtor on 05/19/2026. Filed by John K Fort. (Fort, John) (Entered: 05/19/2026)
05/19/2026	17	Chapter 7 Trustee's Report of No Distribution: I, John K Fort, having been appointed trustee of the estate of the above-named debtor(s), report that I have neither received any property nor paid any money on account of this estate; that I have made a diligent inquiry into the financial affairs of the debtor(s) and the location of the property belonging to the estate; and that there is no property available for distribution from the estate over and above that exempted by law. Pursuant to Fed R Bank P 5009, I hereby certify that the estate of the above-named debtor(s) has been fully administered. I request that I be discharged from any further duties as trustee. Key information about this case as reported in schedules filed by the debtor(s) or otherwise found in the case record: This case was pending for 1 months. Assets Abandoned (without deducting any secured claims): \$ 8817.00, Assets Exempt: Not Available, Claims Scheduled: \$ 1046715.00, Claims Asserted: Not Applicable, Claims scheduled to be discharged without payment (without deducting the value of collateral or debts excepted from discharge): \$ 1046715.00. Filed by John K Fort. (Fort, John) (Entered: 05/19/2026)
05/19/2026	18	Trustee Certification of Services Rendered Under 11 U.S.C. Section 330(e). I rendered the following service in the case and am eligible for payment under 11 U.S.C. Section 330(e): Filed a Report of No Distribution. I declare under penalty of perjury that the foregoing is true and correct. (Executed on 5/19/2026). Filed by John K Fort (related document(s) 17). (Fort, John) (Entered: 05/19/2026)
06/15/2026		Installment Payment - SECOND of \$80.00 Receipted on 6/15/2026. Balance Due: \$158.00. (Woods, D) (Entered: 06/15/2026)
06/15/2026		Receipt of Chapter 7 Filing Fee(installments) - \$80.00 by DW. Receipt Number 302076. (admin) (Entered: 06/15/2026)
06/16/2026		Installment Payment - THIRDInstallment Payment - FOURTH of \$158.00 Receipted on 6/16/2026. Balance Due: \$0.00. (Ting, K) (Entered: 06/16/2026)
06/16/2026		Receipt of Chapter 7 Filing Fee(installments) - \$158.00 by KT. Receipt Number 302080. (admin) (Entered: 06/16/2026)

07/20/2026	<u>19</u> (35 pgs; 3 docs)	Adversary case 26-80039. Complaint by Andrew Taylor, Naomi Taylor, South Carolina Educational Credit for Exceptional Needs Children Fund, Chad Connelly, Neil Mellen, Neil Persons, Stephen Kirkland, Geoffrey K. Chambers, Dave Wilson against Jefferson Davis, Jr. Proceeding. Fee: 350.00. (Attachments: # <u>1</u> Exhibit # <u>2</u> Exhibit) (67 (Dischargeability - 523(a)(4), fraud as fiduciary, embezzlement, larceny)) (Sanders, Laurie) (Entered: 07/20/2026)
07/31/2026	<u>20</u> (1 pg)	Notice re: Electronic Filing Deadline. Effective August 17, 2026, self-represented parties may electronically file documents with the Court by utilizing the Court's Electronic Document Submission System (EDSS) ONLY during the fourteen (14) day period after the date the bankruptcy case was filed (also known as the "Petition Date"). Additional information provided in the Notice. (ADI) (Entered: 07/31/2026)
08/03/2026	<u>22</u> (2 pgs)	Financial Management Course Certificate Filed Filed by Ronald Jefferson Davis, Jr . (Montgomery, S) (Entered: 08/05/2026)
08/06/2026	<u>23</u> (2 pgs; 2 docs)	Retransmission of Notice re: Electronic Filing Deadline to BNC for Service. (Baker, P) (Entered: 08/06/2026)
08/08/2026	<u>24</u> (3 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 08/08/2026. (Related Doc # <u>23</u>) (Admin.) (Entered: 08/09/2026)
09/06/2026	<u>25</u> (1 pg)	Notice of Appearance and Request for Notice Filed by Geoffrey Chambers of The Hendricks Firm on behalf of Stephen Kirkland, South Carolina Educational Credit for Exceptional Needs Children Fund, Dave Wilson, Neil Mellen, Thomas Persons, Chad Connelly, Andrew Taylor, Naomi Taylor. (Chambers, Geoffrey) (Entered: 09/06/2026)

PACER Service Center			
Transaction Receipt			
10/20/2026 11:19:58			
PACER Login:		Client Code:	
Description:	Docket Report	Search Criteria:	26-01761-eg Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	3	Cost:	0.30

**United States Bankruptcy Court
District of South Carolina (Greenville)
Adversary Proceeding #: 26-80039-eg**

523

Assigned to: Judge Elisabetta G.M. Gasparini

Date Filed: 07/20/26

Lead BK Case: [26-01761](#)

Lead BK Title: Ronald Jefferson Davis, Jr

Lead BK Chapter: 7

Demand:

Nature[s] of Suit: 67 Dischargeability - 523(a)(4), fraud as fiduciary, embezzlement, larceny

Debtor

Ronald Jefferson Davis, Jr
403 McCarter Avenue
Greenville, SC 29615
843-901-8036
SSN / ITIN: xxx-xx-8220

represented by **Ronald Jefferson Davis, Jr**
PRO SE

Plaintiff

Andrew Taylor
P. O. Box 665
Easley, SC 29641

represented by **Geoffrey Chambers**
The Hendricks Firm
PO Box 665
Easley, SC 29641
828-556-5893
Email: GChambers@thehendricksfirm.com

Laurie Sanders, Jr
Woodard and Butler, LLC
P. O. Box 1906
Walterboro, SC 29488
843-817-3572
Fax : 843-538-2322
Email: rwooda@lowcountry.com

Plaintiff

Naomi Taylor
P. O. Box 665
Easley, SC 29461

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

**South Carolina Educational Credit for
Exceptional Needs Children Fund**
P. O. Box 11305
Columbia, SC 29211

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

Chad Connelly
107 Connelly Drive
Prosperity, SC 29127

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

Neil Mellen

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

Neil Persons

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

Stephen Kirkland

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

Plaintiff

Geoffrey K Chambers

represented by **Geoffrey Chambers**
(See above for address)

Laurie Sanders, Jr
(See above for address)

V.

Defendant

Jefferson Davis, Jr.

represented by **Jefferson Davis, Jr.**
PRO SE

Trustee

John K Fort

John K Fort, Chapter 7 Trustee
PO Box 669
29356
Landrum, SC 29356
864-702-8113

Trustee

US Trustee

Strom Thurmond Federal Bldg
1835 Assembly Street
Suite 953
Columbia, SC 29201
(803) 765-5250

Filing Date	#	Docket Text
07/20/2026	1 (35 pgs; 3 docs)	Adversary case 26-80039. Complaint by Andrew Taylor, Naomi Taylor, South Carolina Educational Credit for Exceptional Needs Children Fund, Chad Connelly, Neil Mellen, Neil Persons, Stephen Kirkland, Geoffrey K. Chambers, Dave Wilson against Jefferson Davis, Jr. Proceeding. Fee: 350.00. (Attachments: # 1 Exhibit # 2 Exhibit) (67 (Dischargeability - 523(a)(4), fraud as fiduciary, embezzlement, larceny)) (Sanders, Laurie) (Entered: 07/20/2026)
07/20/2026		Receipt of Filing Fee for Complaint(26-80039-eg) [cmp,cmp] (350.00). Receipt Number A15047784, amount 350.00. (U.S. Treasury) (Entered: 07/20/2026)
07/22/2026		John K Fort added to case. (Montgomery, S) (Entered: 07/22/2026)
07/22/2026	2 (3 pgs; 2 docs)	Summons Issued on Jefferson Davis, Jr. Answer Due 8/21/2026 (except that the United States and its offices and agencies shall have 5 additional days). (Montgomery, S) (Entered: 07/22/2026)
08/21/2026	4 (6 pgs)	Defendant's Motion For Extension Of Time To Respond To Compliant with Certificate of Service Filed by Ronald Jefferson Davis, Jr (related document(s) 1). (Montgomery, S) (Entered: 08/24/2026)

08/25/2026	<u>5</u> (3 pgs; 2 docs)	Order And Notice Of Hearing On Motion For Extension Of Time To Respond To Complaint. DATES TO FILE: Response/Objections Due: 09/10/2026. Document Served (related document(s) <u>2</u> , <u>4</u> , <u>1</u>). Hearing scheduled for 9/22/2026 at 10:00 AM at Greenville. The case judge is Elisabetta G.M. Gasparini. (Montgomery, S) (Entered: 08/25/2026)
08/27/2026	<u>6</u> (4 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 08/27/2026. (Related Doc # <u>5</u>) (Admin.) (Entered: 08/28/2026)
09/06/2026	<u>7</u> (1 pg)	Notice of Appearance and Request for Notice Filed by Geoffrey Chambers of The Hendricks Firm on behalf of Geoffrey K Chambers, Chad Connelly, Stephen Kirkland, Neil Mellen, Neil Persons, South Carolina Educational Credit for Exceptional Needs Children Fund, Andrew Taylor, Naomi Taylor. (Chambers, Geoffrey) (Entered: 09/06/2026)
09/07/2026	<u>8</u> (11 pgs; 3 docs)	Proposed Order RE: Order And Notice Of Hearing On Motion For Extension Of Time To Respond To Complaint. DATES TO FILE: Response/Objections Due: 09/10/2026. Document Served (related document(s) <u>2</u> , <u>4</u> , <u>1</u>). Hearing scheduled for 9/22/2026 at 10:00 AM at Greenville. The case judge is Elisabetta G.M. Gasparini. <i>Proposed Consent Order</i> Filed by Laurie Sanders Jr of Woodard and Butler, LLC, Geoffrey Chambers of The Hendricks Firm on behalf of Geoffrey K Chambers, Chad Connelly, Stephen Kirkland, Neil Mellen, Neil Persons, South Carolina Educational Credit for Exceptional Needs Children Fund, Andrew Taylor, Naomi Taylor. (related document(s) <u>5</u>). (Attachments: # <u>1</u> Exhibit Joint Notice of Submission of Consent Order # <u>2</u> Exhibit Acceptance of Service by Ronald Jefferson Davis, Jr.) (Chambers, Geoffrey) (Entered: 09/07/2026)
09/08/2026	<u>9</u> (5 pgs; 2 docs)	Consent Order Resolving Service And Granting Extension Of Time To Respond To Complaint (related document(s) <u>5</u> , <u>4</u>). (Montgomery, S) (Entered: 09/08/2026)
09/08/2026		Jefferson Davis, Jr. Answer Deadline Reset for 9/21/2026. (Montgomery, S) (Entered: 09/08/2026)
09/10/2026	<u>10</u> (6 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 09/10/2026. (Related Doc # <u>9</u>) (Admin.) (Entered: 09/11/2026)
09/21/2026	<u>12</u> (16 pgs)	Defendant's Motion to Dismiss Compliant Pursuant To Fed.R.CIV.P.12(b) (6) And Memorandum Of Law with Certificate of Service Filed by Ronald Jefferson Davis, Jr. (Montgomery, S) Modified on 9/22/2026 (Montgomery, S). to edit caption (Entered: 09/22/2026)
09/24/2026	<u>13</u> (3 pgs; 2 docs)	Order Scheduling Deadlines On Defendant's Motion To Dismiss Compliant (related document(s) <u>12</u>). (Montgomery, S) Modified on 9/24/2026 (Montgomery, S). Any response to the Motion should be filed no later than October 14, 2026. (Entered: 09/24/2026)
09/26/2026	<u>14</u> (4 pgs)	Certificate of Service of Document as served by the Bankruptcy Noticing Center. Notice Date 09/26/2026. (Related Doc # <u>13</u>) (Admin.) (Entered: 09/27/2026)

09/28/2026	15 (1 pg)	Returned mail processed for the week beginning 09/21/2026 through 09/27/2026. (Admin) (Entered: 09/28/2026)
10/16/2026	17 (5 pgs)	Correspondence re: Defendant's Request For Ruling On The Papers Filed by Jefferson Davis, Jr. . (related document(s) 12 , 13). (Montgomery, S) (Entered: 10/20/2026)

PACER Service Center			
Transaction Receipt			
10/20/2026 11:08:57			
PACER Login:		Client Code:	
Description:	Docket Report	Search Criteria:	26-80039-eg Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	3	Cost:	0.30

EXHIBIT 03

IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH CAROLINA

_____	:	
In re:	:	
	:	
Ronald Jefferson Davis, Jr.,	:	Case No.: 26-01761-EG
	:	
Debtor.	:	Chapter 7
_____	:	
	:	
Andrew Taylor, Naomi Taylor,	:	
South Carolina Educational Credit for	:	
Exceptional Needs Children Fund,	:	
Chad Connelly, Neil Mellen,	:	
Thomas Persons, Stephen Kirkland,	:	
Geoffrey K. Chambers, and Dave Wilson	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Proc. No. 26-80039-EG
	:	
Jefferson Davis, Jr.,	:	
	:	
Defendant.	:	
_____	:	

CONSENT ORDER RESOLVING SERVICE AND GRANTING EXTENSION OF TIME TO RESPOND TO COMPLAINT

THIS MATTER is before the Court upon (a) the Complaint filed July 20, 2026; (b) Defendant’s Motion for Extension of Time to Respond to Complaint filed August 21, 2026 (ECF No. 4) (the “Motion”); and (c) the Court’s Order and Notice of Hearing entered August 25, 2026 (the “August 25 Order”).

The August 25 Order directed Plaintiffs to submit, within ten (10) days, proof of timely service, a document signed by Defendant waiving or accepting service, or a request for reissuance of the Summons. The August 25 Order further directed the parties to consult and make a good-faith effort to propose a consensual order addressing the service issues and the relief sought in the Motion.

Defendant has executed an Acceptance and Waiver of Service of Summons and Complaint. Plaintiffs consent to the relief requested in the Motion. The parties have submitted this Consent Order for the Court's consideration.

The Court having reviewed the Motion, the August 25 Order, Defendant's Acceptance and Waiver of Service, and this Consent Order, and being otherwise fully advised, it is hereby

ORDERED that Defendant's Acceptance and Waiver of Service of Summons and Complaint is approved and is deemed to satisfy the service directive set forth in the August 25 Order;

FURTHER ORDERED that Defendant has accepted and waived formal service of the Summons issued July 22, 2026, and the Complaint filed July 20, 2026, and has withdrawn any objection to the sufficiency of process or the sufficiency of service of process under Fed. R. Civ. P. 12(b)(4) and 12(b)(5), as made applicable by Fed. R. Bankr. P. 7012;

FURTHER ORDERED that the Motion is GRANTED, and the deadline for Defendant to answer or otherwise respond to the Complaint is extended by thirty (30) days, through and including September 21, 2026;

FURTHER ORDERED that this Consent Order does not waive, and shall not be construed as a waiver of, any other defense, objection, or right available to Defendant, including without limitation any defense under Fed. R. Civ. P. 12(b)(6) or any request for relief under Fed. R. Civ. P. 21;

FURTHER ORDERED that the hearing scheduled for September 22, 2026, at 10:00 a.m. at the Clement F. Haynsworth Federal Building and U.S. Courthouse, 300 East Washington Street, Greenville, SC 29601, is CANCELLED; and

FURTHER ORDERED that the Court retains jurisdiction to interpret and enforce this Consent Order.

AND IT IS SO ORDERED.

FILED BY THE COURT
09/08/2026



Entered: 09/08/2026

A handwritten signature in black ink, appearing to read "Elisabetta G. M. Gasparini".

Elisabetta G. M. Gasparini
US Bankruptcy Judge
District of South Carolina

WE CONSENT:

COUNSEL FOR PLAINTIFFS:

s/Geoffrey K. Chambers

Geoffrey K. Chambers
PO Box 665
Easley, SC 29641

Laurie C. Sanders, Jr.
P.O. Box 1906
Walterboro, SC 29488
Counsel for Plaintiffs
Date: September 6, 2026

DEFENDANT, PRO SE:



Jefferson Davis, Jr.
Defendant, *Pro Se*
403 McCarter Avenue
Greenville, SC 29615
843-901-8036 (cell)
jeff@apogeetax.com
Date: September 1, 2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

EXHIBIT 04

In re,

Ronald Jefferson Davis, Jr,

Debtor(s).

Andrew Taylor
Naomi Taylor
South Carolina Educational Credit for
Exceptional Needs Children Fund
Chad Connelly
Neil Mellen
Neil Persons
Stephen Kirkland
Geoffrey K Chambers,

Plaintiff(s),

v.

Jefferson Davis, Jr.,

Defendant(s).

C/A No. 26-01761-EG

Adv. Pro. No. 26-80039-EG

Chapter 7

**ORDER SCHEDULING DEADLINES
ON DEFENDANT'S MOTION TO
DISMISS COMPLAINT**

THIS MATTER is before the Court on the Motion to Dismiss Complaint (“Motion”) filed by Ronald Jefferson Davis, Jr. (“Defendant”).¹ On July 20, 2026, Plaintiffs Andrew Taylor, Naomi Taylor, South Carolina Educational Credit for Exceptional Needs Children Fund, Chad Connelly, Neil Mellen, Neil Persons, Stephen Kirkland, Geoffrey K. Chambers, and Dave Wilson (“Plaintiffs”) filed a Complaint to Determine Dischargeability of Debt Pursuant to 11 U.S.C. § 523 against Defendant.² The Motion to Dismiss seeks for the Court to (a) dismiss all causes of actions asserted in the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) and (b) sever Counts I from Counts II and III pursuant to Fed. R. Civ. P. 7021, both made applicable to this proceeding pursuant to

¹ ECF No. 12, filed Sept. 21, 2026.

² ECF No. 1.

Fed. R. Bankr. P. 7012 and 7021. Any responses or objections to the Motion should be filed **no later than October 14, 2026**. After the expiration of the deadline set forth herein, and upon the review of the Motion and any response thereto, the Court may request a reply or further pleadings for the party or may set the matter for a hearing if it deems it necessary.

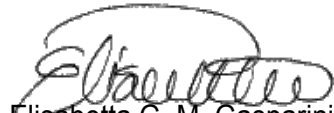
The Clerk's Office is hereby directed to serve a copy of this Order on all parties to the adversary proceeding.

AND IT IS SO ORDERED.

**FILED BY THE COURT
09/24/2026**



Entered: 09/24/2026



Elisabetta G. M. Gasparini
US Bankruptcy Judge
District of South Carolina

RECEIVED

Oct 20 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 **APPELLANT'S THIRD STATUS UPDATE** on the below
named parties via First Class Mail and / or email on **October 20th, 2026**.

[CONTINUED ON NEXT PAGE.]

M. Dawes Cooke, Jr., Esq. & Justin Paul Novak, Esq.
Barnwell Whaley
P.O. Drawer H, Charleston SC 29402
mdc@barnwell-whaley.com
jnovak@barnwell-whaley.com
(843) 577-7700

Connelly, Wilson, Persons & Mellen

Douglas Walker MacKelcan, III, Esq. & Skyler C. Wilson, Esq.
Carlock, Copeland & Stair, LLP
40 Calhoun St., Ste. 400, Charleston SC 29401
dmackelcan@cskl.law
swilson@cskl.law

Stephen D. Kirkland, CPA, CMA

Jessica E. Kinard, Esq.
Law Offices of Jessica E. Kinard
PO Box 667
Columbia, SC 29202
jessica.kinard@columbiasc.gov

John Doe #1 / Anonymous (JeffDavisFIRST.com website)

Benjamin T Coppage, Esq.
Coppage Law Firm, LLC
1010 Carteret St.
Beaufort SC 29902
ben@coppagelawfirm.com
(843) 379-9601

John Doe #2

Geoffrey Chambers, Esq.
CPER Law Group, LL
411 Walnut Street #10646
Green Cove Springs, FL 32043
g.k.chambers@gmail.com
geoffrey@cperllgroup.com
(864) 508-0899

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

[CONTINUED ON NEXT PAGE.]

Jasmine Denise Smith, Esq. &
Calhoun J. Watson, Esq.
Robinson Gray
PO Box 11449
Columbia, SC 29211
jsmith@robinsongray.com
cwatson@robinsongray.com
E3 Software

Susie Jean Lloyd, Esq. &
Harper S Seldin, Esq.
Cozen O'Connor
301 S. College St., Suite 3400
Charlotte NC 28202
susielloyd@parkerpoe.com
slloyd@cozen.com
HSeldin@cozen.com
Endurance International



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