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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2019-001231  
Civil Action No. 2017-CP-40-06976

**RECEIVED**  
MAR 09 2020  
SC Court of Appeals

Jefferson Davis, Jr. .... Appellant,

v.

South Carolina Educational Credit for  
Exceptional Needs Children Fund, ..... Respondent

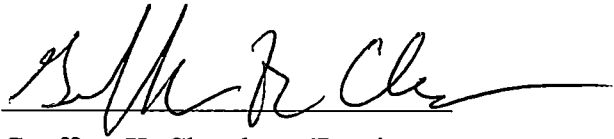
**RESPONDENT EDUCATIONAL CREDIT FOR EXCEPTIONAL NEEDS CHILDREN FUND'S NOTICE  
AND MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b), SCACR, Respondent South Carolina Educational Credit for Exceptional Needs Children Fund requests a 45-day extension of time to file its Initial Brief and Designation of Matter for the Record on Appeal. Appellant's Initial Brief was filed on February 3, 2020. The deadline for Respondent's Initial Brief is March 4, 2020. Respondent requests that the deadline for filing be extended for a period of 45 days. This request for extension is to allow for Counsel's schedule to absorb Appellant's recently filed complaints against Respondent with two South Carolina Agencies and a freshly filed TRO and Motion for Declaratory Judgment filed by Appellant against Respondent in Newberry County. This motion is made in good faith and not for purposes of delay.

In an abundance of caution, Counsel also moves to relax deadlines in the event this motion does not reach the post office before the last mail pickup at 5:00 pm today. Counsel asserts that it will be placed in the postal mailbox today.

(signatures on next page)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. K. Chambers', written over a horizontal line.

Geoffrey K. Chambers, Esquire  
CPerl Group  
411 Walnut Street  
Number 10646  
Green Cove Springs, FL 32043  
Phone: 864-508-0899  
Geoffrey@CPerlgroup.com

***Attorney for Respondent Educational  
Credit for Exceptional Needs Children Fund***

March 4, 2020

Flat Rock, North Carolina

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CERTIFICATE OF SERVICE

I, Geoffrey Chambers, attorney for Respondent Educational Credit for Exceptional Needs Children Fund, do hereby certify that I have served a copy of the foregoing Respondent's Motion for Extension of Time in connection with the above-referenced case by mailing a copy of the same to the following address: Jefferson Davis, Jr., 403 McCarter Avenue, Greenville, SC 29615

(signature on next page)

A handwritten signature in black ink, appearing to read "G. K. Chambers", written over a horizontal line.

Geoffrey K. Chambers

Flat Rock, North Carolina

March 4, 2020



# Consumer Protection, Environmental, and Regulatory Law Group, LLC

From the desk of:  
Geoffrey K. Chambers  
(864) 508-0899  
geoffrey@CPERLGroup.com

Wednesday, March 4, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO BOX 11629  
Columbia, SC 29211

RE: Jefferson Davis, Jr. v. South Carolina Educational Credit for Exceptional Needs Children Fund,  
Appellate Case No. 2019-001231

Dear Ms. Kitchings,

Please find enclosed the original and two copies of the initial brief of Respondent Randy Page. By copy of this letter I am serving the same on the Appellant by US mail.

Thank you for your assistance.

Sincerely,

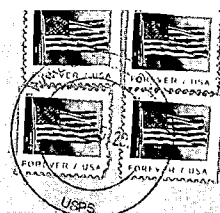
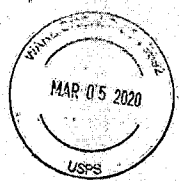
A handwritten signature in cursive script that reads "Geoffrey K. Chambers".

Geoffrey Chambers

CC:  
Jefferson Davis, Jr. *Pro Se Plaintiff*

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Green Cove Springs FL 32043



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