

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
MAR 12 2020  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Hon. DeAndrea Gist Benjamin, Circuit Court Judge

C.A. No.: 2017-CP-40-06976  
Appellate Case No. 2019-001231

Jefferson Davis, Jr. ....Appellant,

v.

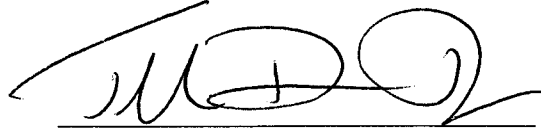
South Carolina Educational Credit for Exceptional Needs Children Fund, .....Respondent.

**APPELLANT'S RESPONSE IN OPPOSITION TO  
RESPONDENT'S MOTION FOR 45-DAY EXTENSION OF TIME**

Appellant, Jefferson Davis, Jr., hereby responds to Respondent South Carolina Educational Credit for Exceptional Needs Children Fund (hereinafter "ECENC Fund") defective Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter.

**45-DAY EXTENSIONS NOT ALLOWED:** Appellant initially states that he has no general objection to an extension of time, however Appellant does object to a 45-day extension as it does not appear allowed under SCACR (only 30-day extensions are allowed except in extenuating circumstances). If the Court sees fit to granted said extension, the Appellant would request that the extension be limited to only 30-days.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'JD', is written over a horizontal line.

Jefferson Davis, Jr.

Appellant

403 McCarter Avenue

Greenville, SC 29615

843-901-8036 (cell)

*jeff@apogeetax.com*

Date: March 9, 2020

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PROOF OF SERVICE

I, the undersigned Appellant does hereby certify that I have caused to be mailed and/or otherwise transmitted a copy of the below listed documents to the party shown below, postage prepaid, on the **9<sup>th</sup> day of March, 2020**, as follows:

PLEADINGS:                   **APPELLANT'S RESPONSE IN OPPOSITION TO  
RESPONDENT'S MOTION FOR 45-DAY  
EXTENSION OF TIME**

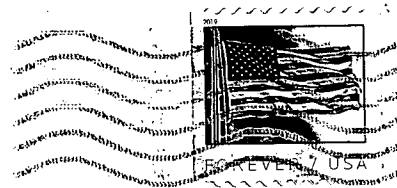
PARTY SERVED:               Geoffrey Kelly Chambers, Esq.  
411 Walnut Street No. 10646  
Green Cove Springs, FL 32043-3443.  
Attorney for Respondent



Jefferson Davis, Jr., Appellant  
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Greenville, SC 29615

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MAR 12 2020

SC Court of Appeals  
**The Honorable Jenny Abbott Kitchings**  
**Clerk, South Carolina Court of Appeals**  
**P.O. Box 11629**  
**Columbia, SC 29211**

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