

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Hon. Doyet A. Early, Circuit Court Judge

RECEIVED

MAR 26 2020

SC Court of Appeals

C.A. No.: 2018-CP-40-02425
Appellate Case No. 2019-000648

Jefferson Davis, Jr.Appellant.

v.

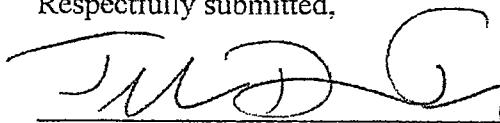
Ellen Weaver, Chad Connelly, Oran P. Smith, Neil J. Mellen, Howard S. Rich, Rick Reames, Stephen D. Kirkland, Palmetto Promise Institute, Palmetto Family Council, Palmetto Family Action, South Carolinians for Responsible Government, SCRG Foundation, Access Opportunity South Carolina, Friedman Foundation for Educational Choice, Inc., Cato Institute, South Carolina Educational Credit for Exceptional Needs Children Fund, South Carolina Education Oversight Committee, South Carolina Department of Revenue, South Carolina Department of Labor, Licensing and Regulation, First Impressions, Inc. d/b/a/ Richard Quinn & Associates, First Tuesday Strategies, LLC, Bill Wilson, Jason Bedrick, Jim DeMint, Randy Page, Tony Denny, Phillip Cease, Melanie Barton, Doris Cubitt, Susan Thomas, John McCormick, Nate Leupp, Institute of Management Consultants USA & John Doe(s) 1-40 Respondents.

APPELLANT’S MOTION TO EXTEND REPLY (RE MOTION TO STRIKE)

Pursuant to Rules 208(a), 211 and 240 of the South Carolina Appellate Court Rules, as well as the March 20, 2020, Supreme Court of South Carolina Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (Appellate Case No. 2020-000447) and any other issued or to be issued Orders related to the Coronavirus Emergency, Appellant Jefferson Davis, Jr., (“Appellant”) respectfully requests an extension of time to file **Appellant’s Reply** related to his **Motion to Strike** (stamped filed March 11, 2020).

Given the confusion as to what specific date **Appellant’s Reply** related to his Motion to Strike is due, Appellant would request a date certain of **Friday April 17th, 2020**.

Respectfully submitted,

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

Date: March 26, 2020

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

THE STATE OF SOUTH CAROLINA
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MAR 26 2020

SC Court of Appeals

Hon. Doyet A. Early, Circuit Court Judge

C.A. No.: 2018-CP-40-02425
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Jefferson Davis, Jr.Appellant,

v.

Ellen Weaver, Chad Connelly, Oran P. Smith, Neil J. Mellen, Howard S. Rich, Rick Reames, Stephen D. Kirkland, Palmetto Promise Institute, Palmetto Family Council, Palmetto Family Action, South Carolinians for Responsible Government, SCRG Foundation, Access Opportunity South Carolina, Friedman Foundation for Educational Choice, Inc., Cato Institute, South Carolina Educational Credit for Exceptional Needs Children Fund, South Carolina Education Oversight Committee, South Carolina Department of Revenue, South Carolina Department of Labor, Licensing and Regulation, First Impressions, Inc. d/b/a/ Richard Quinn & Associates, First Tuesday Strategies, LLC, Bill Wilson, Jason Bedrick, Jim DeMint, Randy Page, Tony Denny, Phillip Cease, Melanie Barton, Doris Cubitt, Susan Thomas, John McCormick, Nate Leupp, Institute of Management Consultants USA & John Doe(s) 1-40Respondents.

PROOF OF SERVICE

I certify that I have served the **APPELLANT'S MOTION TO EXTEND REPLY (RE MOTION TO STRIKE)** on the below named parties at the email addresses noted on March 26, 2020. Due to the current Coronavirus Emergency, no hard copy is being mailed.

Geoffrey Kelly Chambers, Esq.
CPER Law Group LLC
411 Walnut Street No. 10646
Green Cove Springs FL 32043-3443
g.k.chambers@gmail.com
geoffrey@cperlgroup.com
ECENC Fund & Randy Page

M. Dawes Cooke, Jr. &
Justin Paul Novak
Barnwell Whaley
P.O. Drawer H
Charleston SC 29402
mdc@barnwell-whaley.com
jnovak@barnwell-whaley.com
ECENC Fund

J. Kenneth Carter, Jr. & Ross Durant
 Turner Padgett
 PO Box 1473
 Columbia, SC 29202
kcarter@turnerpadgett.com
rdurant@turnerpadgett.com
RBurckhalter@turnerpadgett.com
**Ellen Weaver, Oran Smith,
 Jim DeMint & PPI**

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

Jason Luther
 SC Department of Revenue
 PO Box 12265
 Columbia, SC 29211-9979
jason.luther@dor.sc.gov
SC Department of Revenue

William H. Davidson, II &
 Michael Brian Wren
 Davidson, Wren & Plyler, P.A.
 PO Box 8568
 Columbia SC 29202-8568
wdavidson@dml-law.com
mwren@dml-law.com
nbouknight@dml-law.com
**SC Department of Revenue
 & Rick Reames**

Kenneth Davis & Tierney Dukes
 Boykin & Davis, LLC
 PO Box 11844
 Columbia SC 29211
kdavis@boykinlawsc.com
tdukes@boykinlawsc.com
tjboykin@boykinlawsc.com
cjboykin@boykinlawsc.com
EOC & Melanie Barton

Andrew E. Haselden, Esq.
 Howser, Newman & Besley, LLC
 215 East Bay Street, Suite 303
 Charleston, SC 29401
ahaselden@hnblaw.com
LLR & Doris Cubitt

James H. "Jamey" Goldin
 Nelson Mullins
 PO Box 11070
 Columbia SC 29211
jamey.goldin@nelsonmullins.com
AOSC

Christopher J. Daniels, Esq.
 Nelson Mullins
 PO Box 11070
 Columbia SC 29211
chris.daniels@nelsonmullins.com
linda.silvey@nelsonmullins.com
EdChoice

Joseph C. Chapelle, Esq.
 Barnes & Thornburg, LLP
 11 South Meridian Street
 Indianapolis, IN 46204
joe.chapelle@btlaw.com
jchapelle@btlaw.com
EdChoice – pro hac vice

Miles Edward Coleman, Esq.
 Nelson Mullins
 2 W. Washington Street, Suite 400
 Greenville SC 29601
miles.coleman@nelsonmullins.com
Howard Rich & Cato Institute

Jennifer Foulk Nutter, Esq.
 Hood Law Firm, LLC
 PO Box 1508
 Charleston SC 29402-1508
jennifer.nutter@hoodlaw.com
josh.stark@hoodlaw.com
melinda.accardo@hoodlaw.com
stephanie.chickey@hoodlaw.com
IMCUSA

Mark Gende & Brandon Rottscharl
Sweeny, Wingate & Barrow, P.A.
PO Box 12129
1515 Lady Street
Columbia SC 29211
mvg@swblaw.com
brg@swblaw.com
Phillip Cease & SCRG

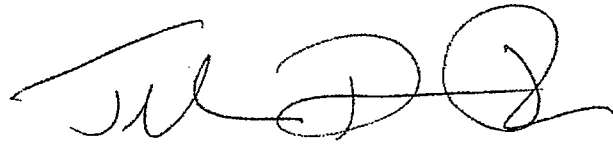
Mark Steven Barrow
Sweeny, Wingate & Barrow, P.A.
PO Box 12129
1515 Lady Street
Columbia SC 29211
msb@swblaw.com
PFC & PFA

Martin S. Driggers, Jr.
Sweeny, Wingate & Barrow, P.A.
Pee Dee Regional Office
115 Cargill Way, Ste. B
Hartsville SC 29550
msd@swblaw.com
PFC & PFA

Joseph M. McCulloch, Jr.
& Kathy R. Schillaci
McCulloch & Schillaci
PO Box 11623
Columbia SC 29211
joe@mccullochlaw.com
kathy@mccullochlaw.com
First Tuesday Strategies, LLC

Benjamin P. Mustian, Esq.
BPM Law, LLC
141 Pelham Drive, Suite F #108
Columbia, SC 29209
bpmlawsc@gmail.com
First Impressions, d/b/a
Richard Quinn & Associates

R. Hawthorne Barrett, Esq.
Turner Padgett
PO Box 1473
Columbia, SC 29202
tbarrett@turnerpadgett.com
Tony Denny



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

3/26/2020

ApogeeTax Mail - RE: Davis v. Weaver, PPI, et al [2018-CP-40-2425] - APPEAL FILING



Jeff Davis <jeff@apogeetax.com>

RE: Davis v. Weaver, PPI, et al [2018-CP-40-2425] - APPEAL FILING

1 message

Jeff Davis <jeff@apogeetax.com> Thu, Mar 26, 2020 at 8:40 AM

To: Jeff Davis <jeff@apogeetax.com>
Bcc: msb@swblaw.com, msd@swblaw.com, dmackelcan@cskl.law, swilson@cskl.law, jason.luther@dor.sc.gov, mwren@dmi-law.com, nbouknight@dmi-law.com, w davidson@dmi-law.com, cjboykin@boykinlawsc.com, kdavis@boykinlawsc.com, tjboykin@boykinlawsc.com, tdukes@boykinlawsc.com, jennifer.nutter@hoodlaw.com, josh.stark@hoodlaw.com, melinda.accardo@hoodlaw.com, stephanie.chickey@hoodlaw.com, kcarter@turnerpadget.com, rdurant@turnerpadget.com, kbates@turnerpadget.com, RBurckhalter@turnerpadget.com, chris.daniels@nelsonmullins.com, linda.silvey@nelsonmullins.com, joe.chapelle@btlaw.com, jchapelle@btlaw.com, g.k.chambers@gmail.com, geoffrey@cperlgroup.com, jnovak@barnwell-whaley.com, mdc@barnwell-whaley.com, joe@mccullochlaw.com, kathy@mccullochlaw.com, miles.coleman@nelsonmullins.com, mvg@swblaw.com, brg@swblaw.com, bpmllawsc@gmail.com, ahaselden@hnbllaw.com, tbarrett@turnerpadget.com, jamey.goldin@nelsonmullins.com

RE: Davis v. Weaver, PPI, et al [2018-CP-40-2425]
Appellate Case No. 2019-000648
> Motion to Extend Filing (Reply re Motion to Strike)

Dear Counsel for Respondents,

Please find attached a filing today (March 26, 2020) in the above referenced appellate case.

If you have any questions or concerns, please do not hesitate to contact me.

Hard copies are not being mailed due to recent directions from the Court related to the Coronavirus Emergency. Please stay safe.

Best,

Jeff Davis
843-901-8036 (cell)

RECEIVED

MAR 26 2020

SC Court of Appeals

Jeff Davis, JD, MBA
403 McCarter Avenue | Greenville, SC 29615
843-901-8036 (cell) | jeff@apogeetax.com

Attention: The information contained in this E-mail message is attorney privileged and confidential information intended only for the use of the individual(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited. If you have received this communication in error, please contact the sender by reply E-mail and destroy all copies of the original message. Active and licensed attorney and CPA in Georgia (not SC). Thank you.

2020-03-26 - Filing Emailed - excludes email to Respondents.pdf
2661K

March 26, 2020

VIA US MAIL & FAX (803-734-1839)

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

MAR 26 2020
SC Court of Appeals

RE: Jefferson Davis Jr, Appellant vs. Ellen Weaver, Et al. Respondents
Appellate Case No.: 2019-000648
C.A. NO. 2018-CP-40-02425

Dear Ms. Kitchings:

In an abundance of caution, please find enclosed **Appellant's Motion to Extend Reply (RE Motion to Strike)**. Only one copy is enclosed per recent directions from the Court.

I have also served this filing on Respondents via email for safety reasons. Pursuant to recent Orders from the Supreme Court of South Carolina, it appears service by email is preferred due to the current Coronavirus Emergency.

Also pursuant to recent Orders from the Supreme Court of South Carolina waiving the motion fees for coronavirus filings, no motion fee has been included. Please let me know if a filing fee is required.

I have included a copy of the email used to send this filing to Respondents.

If you have any questions, please feel free to email me at jeff@apogeetax.com or give me a call at 843-901-8036 (cell).

Sincerely,



Jeff Davis, JD, MBA
Appellant
403 McCarter Avenue
Greenville, SC 29615
843-901-8036 (cell)
jeff@apogeetax.com

Jeff Davis, JD, MBA
403 McCarter Avenue
Greenville, SC 29615



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

2020-03-26 -- Motion to Extend Reply (re Strike)

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MAR 26 2020

SC Court of Appeals