

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Appellate Case No. 2019-000648
Civil Action No. 2018-CP-40-02425

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APR 10 2020

SC Court of Appeals

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 Alliance, 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, and John Doe(s) 1-40,

Respondents.

Certificate of Service

The undersigned certifies that on this 8th day of April 8, 2020 a bound copy of the Final Brief on behalf of Respondent Institute of Management Consultants USA, was served by depositing said copy in the U.S. Mail, with sufficient first class postage, on the following at the address listed below:

Jefferson Davis, Jr., *Pro Se Plaintiff*
403 McCarter Avenue
Greenville, SC 29615

In compliance with the Supreme Court's order regarding the Operation of the Appellate Courts During the Coronavirus Emergency; Appellate Case No. 2020-000447; issued March 20, 2020, we are serving the following counsel of record via email to their official AIS address as evidenced by the attached email:

Miles Coleman, Esquire

Mark Barrow, Esquire

William Davidson, Esquire

Geoffrey Chambers, Esquire

Christopher Daniels, Esquire

Douglas MacKelcan, Esquire

Michael Wren, Esquire

Martin Driggers, Esquire

Joseph M. McCulloch, Jr., Esquire

Ross C. DuRant, Esquire

J. Kenneth Carter, Jr., Esquire

Kelley Cannon, Esquire

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Mark V. Gende, Esquire

Brandon Gottschall, Esquire

James H. Goldin, Esquire

Alan Grant Jones, Esquire

Kenneth Allen Davis, Esquire

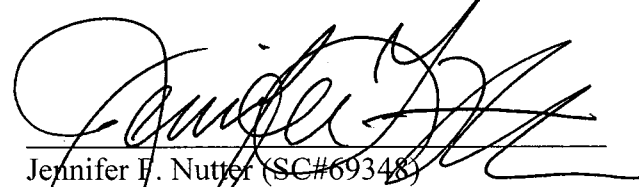
Tierney Felicia Dukes, Esquire

Andrew Elliott Haselden, Esquire

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**Attorneys for Respondent
Institute of Management Consultants USA**

Julie Dunn

From: Stephanie Chickey
Sent: Wednesday, April 8, 2020 3:16 PM
To: miles.coleman@nelsonmullins.com; msb@swblaw.com; wdaivison@dml-law.com; g.k.chambers@gmail.com; chris.daniels@nelsonmullins.com; dmackelcan@carlockcopeland.com; mwren@dml-law.com; msd@swblaw.com; joe@mccullochlaw.com; rdurant@turnerpadget.com; kcannon@hnblaw.com; kcarter@turnerpadget.com; bpmlawsc@gmail.com; jason.luther@dor.sc.gov; mdc@barnwell-whaley.com; jnovak@barnwell-whaley.com; jdavis@apogeetax.com; mvg@swblaw.com; brg@swblaw.com; jamey.goldin@nelsonmullins.com; ajones@elmoregoldsmith.com; kdavis@boykinlawsc.com; tdukes@boykinlawsc.com; ahaselden@hnblaw.com; swilson@cskl.law; kathy@mccullochlaw.com
Cc: Jennifer Nutter; Melinda Accardo; Julie Dunn
Subject: Davis v. Institute of Management Consultants USA, et al.
Attachments: L-Clerk (final brief).pdf

Hood Law Firm is temporarily operating on a remote working basis due to the COVID-19 situation. Please communicate with me via electronic mail or by phone until further notice, as my receipt of office deliveries may be delayed at this time.

Stephanie Chickey

Legal Secretary

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April 8, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
APR 10 2020
SC Court of Appeals

Re: Jefferson Davis, Jr. v. Ellen Weaver, *et al.*
Appellate Case No. 2019-000648
HLF File No. 17.092

Dear Ms. Kitchings:

Enclosed please find the original and one Final Brief of the Respondent IMCUSA which we are submitting for filing in compliance with the Supreme Court's order regarding the Operation of the Appellate Courts During the Coronavirus Emergency; Appellate Case No. 2020-000447; issued March 20, 2020. Accordingly, you will find only the unbound brief with the appropriate cardstock covers, but we will provide additional bound copies when so requested by the Court. Please return the copy to us in the envelope provided. As indicated on the enclosed Certificate of Service, we are serving all attorneys by email to their official AIS address, and we are serving the pro se Appellant by USPS and email.

Kind regards,

Yours truly,


Jennifer F. Nutter

JFN/spc

Enclosure(s)

cc's **Via E-Mail with enclosure:**

Miles Coleman, Esquire
William Davidson, Esquire
Christopher Daniels, Esquire
Michael Wren, Esquire
Joseph M. McCulloch, Jr., Esquire
J. Kenneth Carter, Jr., Esquire
Benjamin Mustian, Esquire
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