

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 16 2020

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

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

Jefferson Davis, Jr. Appellant,

v.

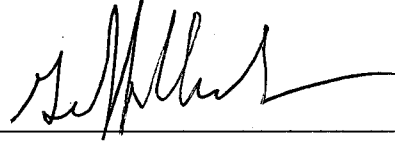
South Carolina Educational Credit for
Exceptional Needs Children Fund, Respondent

**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 seven 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 was extended by order of this Court to April 13, 2020. This request is made to allow time for printing in conjunction with short staff due to the COVID 19 situation and an area wide power outage that has caused this print job to be delayed. Respondent has discussed this request with Appellant and Appellant offered the extension. This motion is made in good faith and not for purposes of delay.

(signatures on next page)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. 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***

April 13, 2020

Flat Rock, North Carolina



Consumer Protection, Environmental, and Regulatory Law Group, LLC

From the desk of:
Geoffrey K. Chambers
(864) 588-0899
geoffrey@CPERLGroup.com

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Monday, April 13, 2020

APR 10 2020

SC Court of Appeals

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 six copies of the Respondent's Motion for Extension. By copy of this letter I am serving the same on the Appellant by US mail.

It is my understanding that the Court has waived motion filing fees on such extensions. If this is not applicable, please let me know and I will send the filing fee to your office.

Thank you for your assistance.

Sincerely,

Geoffrey Chambers

CC:

Jefferson Davis, Jr. *Pro Se Plaintiff*

411 Walnut St

#10646

Green Cove Springs FL 32043



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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia SC 29211