

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

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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 SOUTH CAROLINA EDUCATIONAL CREDIT FOR EXCEPTIONAL NEEDS CHILDREN
FUND'S DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

In the interest of economy and efficiency, and pursuant to Rule 209, SCACR, Respondent Educational Credit for Exceptional Needs Children Fund adopts and incorporates by reference the Designation of Matter filed by Appellant and designates the following matter for inclusion in the record on appeal. Undersigned counsel certifies pursuant to Rule 209(c), SCACR, that the designation contains no matter irrelevant to the appeal.

Orders

Order of the Court dated December 21, 2018

Order of the Court dated July 8, 2019

Pleadings

Complaint

Defendant's Answer to the Complaint

Motions and Memoranda

Respondents Memo in Support of Motion to Dismiss filed June 14, 2018.

Respondents Memo in Support of Motion for Judgment on the Pleadings filed August 17, 2018

Respondents Memo in Support of Motion for Summary Judgment filed August 17, 2018

Respondents Memo in Support of Motion for Judgment on the Pleadings filed September 29, 2018

Respondents Memo in Opposition to Reconsideration filed January 17, 2019

Respondents Revised Memo in Opposition to Reconsideration filed January 28, 2019

Transcripts

Respondent adopts by reference the transcripts of Appellants designation of matter.

Evidence Presented to the Lower Court

SC Legislative Manual 2017-2018 as presented to the Trial Court or in the alternative the legislative manual pages listed below which are identical in content.

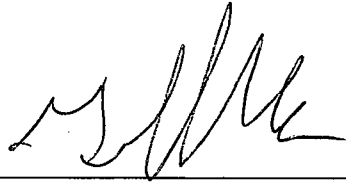
SC Legislative Manual 2099-2020, pages 483 to 489, Boards and Commissions

Supporting Affidavit of Thomas Persons, Sr., filed May 14, 2018

Supporting Affidavit of Thomas Persons, Sr., filed September 28, 2018

[SIGNATURE PAGE ATTACHED]

Respectfully submitted,



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

*Attorney for Defendant South Carolina
Educational Credit for Exceptional Needs
Children Fund*

August 29, 2020
Flat Rock, NC

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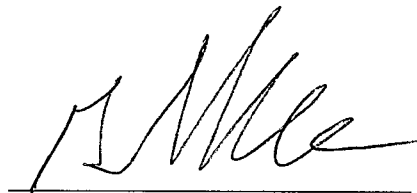
Jefferson Davis, Jr. Appellant,

v.

South Carolina Educational Credit for Exceptional Needs Children Fund Respondent.

CERTIFICATE OF SERVICE

I, Geoffrey Chambers, attorney for Educational Credit for Exceptional Needs Children Fund, do hereby certify that I have served a copy of the foregoing Respondent Educational Credit for Exceptional Needs Children Fund's Initial Brief and Designation of Matter in connection with the above-referenced case by sending a copy by US mail to Appellant Jefferson Davis, Jr., at 403 McCarter Avenue, Greenville, SC 29615



Geoffrey K. Chambers

Flat Rock, NC

April 29, 2020



Consumer Protection, Environmental, and Regulatory Law Group, LLC

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

Wednesday, April 29, 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 one copy of the Respondent's Initial Brief, Designation of Matter and Certificate of Service. 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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