

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

May 12 2020

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

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 MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
INITIAL REPLY BRIEF

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Appellant Jefferson Davis, Jr. hereby moves this honorable Court for an order granting a thirty (30) day extension of time in which to file and serve Appellant’s Initial Reply Brief in the above appeal. Currently, Appellant’s Initial Reply Brief is due on **May 11, 2020**. If the Motion for Extension is granted as proposed, the new deadline will be **June 10, 2020**.

Date: May 11, 2020



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

Other Counsel of Record:
Geoffrey Kelly Chambers, Esq.
411 Walnut Street No. 10646
Green Cove Springs, FL 32043-3443
Attorney for Respondent
(864) 508-0899

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

May 12 2020

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

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.

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 **11th day of May, 2020**, as follows:

PLEADINGS: **APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL REPLY BRIEF**

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



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

Jeff Davis <jeff@apogeetax.com>

Re: Davis v. ECENC Fund [2017-CP-40-6976] Appeal (2019-001231)

1 message

Jeff Davis <jeff@apogeetax.com>
To: g.k.chambers@gmail.com, geoffrey@cperlgroup.com

Mon, May 11, 2020 at 8:29 AM

Re: Davis v. ECENC Fund [2017-CP-40-6976]
Appeal (2019-001231)
> May 11, 2020 - Motion for Extition - Initial Reply Brief

Mr. Chambers,

Please see attached filing in the above referenced appeal case.


Best,

Jeff Davis
843-901-8036 (cell)

RECEIVED
May 12 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.

 **2020-05-11 - Motion for Extension.pdf**
1227K

May 11, 2020

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

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

RECEIVED

May 12 2020

SC Court of Appeals

RE: Jefferson Davis Jr, Appellant vs. SC Educational Credit, Respondent
Appellate Case No.: 2019-001231
C.A. NO. 2017-CP-40-06976

Dear Ms. Kitchings:

Please find enclosed the following for the above referenced matter.

1. **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL REPLY BRIEF**
2. Proof of Service
3. Copy of the email used to send this filing to Respondent

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.

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

cc: Geoffrey Kelly Chambers, Esquire

Fax Transmission

To: Court of Appeals - filings

From: Jeff Davis

Fax: 18037341839

Date: 5/11/2020 8:44:42 AM EDT

RE: Court of Appeals - filings

Pages: 6

Comments:

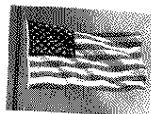
Please see the attached letter and filing.

Thank you,

Jeff Davis
843-901-8036 (cell)
jeff@apogeetax.com

RECEIVED
May 12 2020
SC Court of Appeals

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



RECEIVED

May 12 2020

SC Court of Appeals

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