

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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@apogeeat.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

**RECEIVED**  
MAY 14 2020  
SG Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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 11<sup>th</sup> 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 refrenced appeal case.

Best,

Jeff Davis  
843-901-8036 (cell)

---

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 14 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](mailto: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](mailto:jeff@apogeetax.com)

cc: Geoffrey Kelly Chambers, Esquire

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

RECEIVED

MAY 14 2020

SC Court of Appeals

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

GREENVILLE SC 29615

11 MAY 2020 PM 4 L



2020-05-11 - Extend Reply

29211-162929

