

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Hon. Doyet A. Early, Circuit Court Judge

C.A. No.: 2018-CP-40-02425
Appellate Case No. 2019-000648

RECEIVED
Jun 26 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 Action, 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 & John Doe(s) 1-40Respondents.

**APPELLANT’S RESPONSE TO RESPONDENTS
PALMETTO FAMILY COUNCIL & PALMETTO FAMILY ALLIANCE’S
MOTION TO SUPPLEMENT THE RECORD ON APPEAL**

Appellant, Jefferson Davis, Jr., (“Appellant”) respectfully submits the following response to Respondents Palmetto Family Council and Palmetto Family Alliance’s **MOTION TO SUPPLEMENT THE RECORD ON APPEAL** which was filed on **June 17, 2020**.

Given this honorable Courts prior ruling on a similar Motion to Supplement the Record on Appeal, and in the interest of time, Appellant does not intend to file an objection.

However, Appellant will bring to the Courts attention that Respondents *incorrectly* state in their Motion that they have “**a pending Motion for Extension of Time to file the Final Brief**”. Motion, Page 2. See also Respondents PFC & PFA March 19, 2020 Extension Request.

In a cover letter from the Clerk dated May 21, 2020, all parties were instructed that “**All final briefs are due within thirty (30) days from the date of this order.**” See applicable snapshot of letter below. This instruction made all final briefs due no later than Monday June 22nd, 2020.

<p>Re: Jefferson Davis, Jr. v. Ellen Weaver Appellate Case No. 2019-000648</p> <p>Dear Mr. Davis, Mr. Connelly, Mr. McCormick, Mr. Leupp, and Counsel:</p> <p>Enclosed is a copy of this Court's decision. All final briefs are due within thirty (30) days from the date of this order.</p> <p>Very truly yours,</p> <p><i>V. Claire Allen</i></p> <p>CLERK</p> <p>May 21, 2020 Letter from Clerk of Court.</p>

For whatever reason, even while given clear instructions from the Clerk of Court, it appears numerous Respondents have yet to file their final briefs timely in this matter.

Respectfully submitted,



Date: June 26, 2020

Jefferson Davis, Jr.
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Appellant

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PROOF OF SERVICE

I certify that I have served **APPELLANT’S RESPONSE TO RESPONDENTS PALMETTO FAMILY COUNCIL & PALMETTO FAMILY ALLIANCE’S MOTION TO SUPPLEMENT THE RECORD ON APPEAL** on the below named parties at the email addresses noted on June 26, 2020. Due to the current COVID-19 crisis, no hard copies were mailed.

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June 26, 2020

VIA EMAIL ONLY (ctappfilings@sccourts.org)

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

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Jun 26 2020

SC Court of Appeals

RE: Jefferson Davis Jr, Appellant vs. Ellen Weaver, Et al. Respondents
Appellate Case No.: 2019-000648
C.A. NO. 2018-CP-40-02425

Dear Ms. Kitchings:

Please find enclosed the original of the following for the above referenced matter. Only one copy is enclosed per recent directions from the Court.

- 1. APPELLANT'S RESPONSE TO RESPONDENTS PALMETTO FAMILY COUNCIL & PALMETTO FAMILY ALLIANCE'S MOTION TO SUPPLEMENT THE RECORD ON APPEAL**
2. Proof of Service

I have also served this filing on Respondents only via email (cc'd hereon) for safety reasons. Pursuant to recent Orders from the Supreme Court of South Carolina, it appears service by email is preferred due to the current Coronavirus Emergency.

Thank you for your assistance. If you have any questions, or if hard copies are required, please feel free to email me at jeff@apogeetax.com or give me a call at 843-901-8036 (cell).

Sincerely,



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