

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Hon. Donald B. Hocker, Circuit Court Judge

C.A. No.: 2020-CP-36-00093

**RECEIVED**

**Oct 07 2020**

**SC Court of Appeals**

Jefferson Davis, Jr. ....Appellant,

v.

Chad Connelly, Tom Persons & South Carolina Educational Credit for Exceptional Needs  
Children Fund .....Respondents.

NOTICE OF APPEAL

Jefferson Davis, Jr. ("Davis") appeals the two Orders of the Honorable Donald B. Hocker, electronically filed **June 30<sup>th</sup>, 2020 & September 28, 2020**. On July 13<sup>th</sup>, 2020, Davis timely filed a "Motion to Reconsider" the existing Order dismissing the case on Standing. The Court denied Davis' Motion to Reconsider in an Order electronically filed on **September 28, 2020**. In that same September 28<sup>th</sup>, 2020 Order, the Court also denied Davis' Motion for Perjury. A timely filed "Motion to Reconsider (the Perjury issue)" was denied by the Court on **October 6<sup>th</sup>, 2020**. Davis now timely Appeals the original Orders filed **June 30<sup>th</sup>, 2020. & September 28<sup>th</sup>, 2020**. Attached are copies of said Orders.

Date: October 7<sup>th</sup>, 2020

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

Other Counsel of Record (Attorneys for Respondents):

Geoffrey Kelly Chambers, Esq.  
CPERL Group  
411 Walnut Street No. 10646  
Green Cove Springs, FL 32043-3443  
(864) 508-0899

M. Dawes Cooke, Jr., Esq. & Justin Paul Novak, Esq.  
Barnwell Whaley  
P.O. Drawer H  
Charleston SC 29402  
(843) 577-7700

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Hon. Donald B. Hocker, Circuit Court Judge

C.A. No.: 2020-CP-36-00093

**RECEIVED**

**Oct 07 2020**

**SC Court of Appeals**

Jefferson Davis, Jr. ....Appellant,

v.

Chad Connelly, Tom Persons & South Carolina Educational Credit for Exceptional Needs  
Children Fund .....Respondents.

PROOF OF SERVICE

I certify that I have served the **Notice of Appeal** on the below named parties at the addresses noted by depositing a copy of it in the United States Mail, postage prepaid, on **October 7<sup>th</sup>, 2020**.

Geoffrey K. Chambers, Esq.  
CPER Law Group, LL  
411 Walnut Street #10646  
Green Cove Springs, FL 32043  
*g.k.chambers@gmail.com*  
*geoffrey@cperlgroup.com*  
**Connelly, Persons & ECENC Fund**

Newberry County Clerk of Court  
1226 College Street  
P.O. Drawer 10  
Newberry, SC 29108

M. Dawes Cooke, Jr., Esq. &  
Justin Paul Novak, Esq.  
Barnwell Whaley  
P.O. Drawer H  
Charleston SC 29402  
*mdc@barnwell-whaley.com*  
*jnovak@barnwell-whaley.com*  
**Connelly, Persons & ECENC Fund**

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

October 7, 2020

VIA US MAIL & EMAIL ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))

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

**RECEIVED**

**Oct 07 2020**

**SC Court of Appeals**

**RE: Jefferson Davis Jr, Appellant vs. Chad Connelly, Tom Persons & South Carolina Educational Credit for Exceptional Needs Children Fund, Respondents**  
**C.A. NO. 2020-CP-36-00093**

Dear Ms. Kitchings:

Please find enclosed the following for the above referenced matter. Only one copy is enclosed (or in this case attached) pursuant to recent directions from the Court.

- 1. Notice of Appeal**
- 2. Proof of Service**
- 3. A copy of the Order (electronically filed June 30<sup>th</sup>, 2020), denial of Motion to Reconsider & initial denial of Motion for Perjury (electronically filed September 28<sup>th</sup>, 2020) and Motion to Reconsider Perjury (electronically filed on October 6<sup>th</sup>, 2020) which are to be challenged on appeal.**
- 4. A filing fee of \$250.00**

Thank you for your assistance. 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: Dawes Cooke, Jr., *Esq.*, Justin P. Novak, *Esq.*, & Geoffrey K. Chambers, *Esq.*,  
*Attorneys for Defendants at the trial court level in the Court of Common Pleas.*  
Newberry County Clerk of Court