

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Hon. Donald B. Hocker, Circuit Court Judge

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C.A. No.: 2020-CP-36-00093  
Appellate Case No. 2020-001348

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**RECEIVED**

**Nov 06 2020**

**SC Court of Appeals**

Jefferson Davis, Jr. ....Appellant,

v.

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

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**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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Pursuant to Rules 208(a), 211 and 240 of the South Carolina Appellate Court Rules, as well as the March 20, 2020, Supreme Court of South Carolina Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (Appellate Case No. 2020-000447) and any other issued or to be issued Orders related to the Coronavirus Emergency, Appellant Jefferson Davis, Jr., (“Appellant”) 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 Brief and Designation of Matter in the above appeal.

Currently, Appellant's Initial Brief is due on November 6, 2020. If the Motion for Extension is granted as proposed, the new deadline will be December 7, 2020.

Date: November 6, 2020



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

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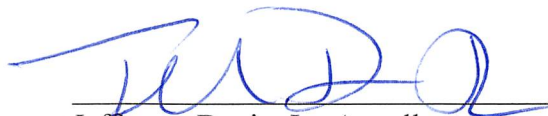
**PROOF OF SERVICE**

I certify that I have served **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER** on the below named parties at the email addresses noted on November 6, 2020. Due to the current coronavirus crisis, no hard copy is being mailed.

Geoffrey Kelly Chambers, Esq.  
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Date: November 6, 2020



Jefferson Davis, Jr., Appellant  
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November 6, 2020

Via Email Only ([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**

**Nov 06 2020**

**SC Court of Appeals**

**RE: Jefferson Davis Jr, Appellant vs. Chad Connelly, Et al. Respondents**  
**Appellate Case No.: 2020-001348**  
**C.A. NO.: 2020-CP-36-00093**

Dear Ms. Kitchings:

Please find attached the original of the following for the above referenced matter.

- 1. APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**
2. Proof of Service

I have also served this filing on Respondents via email only 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, 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  
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cc: Geoffrey Kelly Chambers, Esq. ([g.k.chambers@gmail.com](mailto:g.k.chambers@gmail.com) & [Geoffrey@cperlgroup.com](mailto:Geoffrey@cperlgroup.com)),  
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Justin Paul Novak, Esq. ([jnovak@barnwell-whaley.com](mailto:jnovak@barnwell-whaley.com))