

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Hon. Alex Kinlaw, Jr., Circuit Court Judge

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C.A. No.: 2019-CP-23-06576  
Appellate Case No. 2020-001075

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**RECEIVED**

**Jan 04 2021**

**SC Court of Appeals**

Jefferson Davis, Jr. ....Appellant,

v.

Nate Leupp, Facebook, Inc., & John Doe(s) 1–40, .....Respondent.

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APPELLANT’S DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Appellant proposes the following to be included in the Record on Appeal:

**ORDERS**

1. Form 4 Order filed June 17<sup>th</sup>, 2020 – Granting Defendant Leupp’s Motion to Dismiss finding action is duplicative. Order to follow.
2. Order of Dismissal filed June 29<sup>th</sup>, 2020.
3. Order of Dismissal filed July 27<sup>th</sup>, 2020 – Denied Motion to Reconsider.

**PLEADINGS, MOTIONS & MEMORANDA**

4. Summons & Complaint filed November 12<sup>th</sup>, 2019.
5. Defendant’s Motion to Dismiss and Motion for Sanctions, Injunctive Relief, Costs and Attorney’s Fees Pursuant to Res Judicata, SCRPC Rules 8, 11, 12 and South Carolina Code §15-36-10 filed December 20<sup>th</sup>, 2019.

6. Defendant's Memorandum in Support of Defendant Leupp's Motion to Dismiss and Motion for Sanctions, Injunctive Relief, Costs and Attorney's Fees Pursuant to Res Judicata, SCRCF Rules 8, 11, 12 and South Carolina Code §15-36-10 filed June 16<sup>th</sup>, 2020.
7. Plaintiff's Notice and Motion for Reconsideration of Order & Motion to Amend Complaint filed July 10<sup>th</sup>, 2020.

## TRANSCRIPTS

8. Transcript of June 16<sup>th</sup>, 2020 Motion Hearing.

## **RICHLAND ACTION (C.A. No.: 2018-CP-40-02425, Appellate Case No. 2019-000648)**

9. Richland Action - Complaint filed May 3<sup>rd</sup>, 2018.
10. Richland Action – First Amended Complaint filed November 19<sup>th</sup>, 2018.
11. Richland Action - Docket (as of January 4<sup>th</sup>, 2020).

Appellant certifies that this Designation contains no matter that is irrelevant to this appeal.

Date: January 4<sup>th</sup>, 2021



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

*Appellant*

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**PROOF OF SERVICE**

I certify that I have served the below listed document(s) on the below named party at the email addresses noted on the **4<sup>th</sup> day of January, 2021**. Due to the current coronavirus crisis, no hard copy is being mailed.

PLEADINGS: **INITIAL BRIEF OF APPELLANT and APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

PARTY SERVED: Geoffrey Kelly Chambers, *Esq.*  
411 Walnut Street No. 10646  
Green Cove Springs, FL 32043-3443  
*g.k.chambers@gmail.com*  
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Jefferson Davis, Jr., Appellant  
403 McCarter Avenue | Greenville, SC 29615  
843-901-8036 (cell) | *jeff@apogeeatx.com*

January 4, 2021

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

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**Jan 04 2021**

**SC Court of Appeals**

**RE: Jefferson Davis Jr, Appellant vs. Nate Leupp, et al., Respondent**  
**Appellate Case No.: 2020-001075**  
**C.A. NO.: 2019-CP-23-06576**

Dear Ms. Kitchings:

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

- 1. Initial Brief of Appellant**
- 2. Appellants' Designation of Matter to be Included in the Record on Appeal**
- 3. Proof of Service**

I have also served this filing on Respondent 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  
403 McCarter Avenue | Greenville, SC 29615  
843-901-8036 (cell) | [jeff@apogeetax.com](mailto:jeff@apogeetax.com)

cc: Geoffrey Kelly Chambers, Esq. (*via email only per COVID-19 Orders*)  
([g.k.chambers@gmail.com](mailto:g.k.chambers@gmail.com) & [Geoffrey@cperlgroup.com](mailto:Geoffrey@cperlgroup.com))