

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
Appellate Case No. 2020-001348

RECEIVED
Jan 04 2021
SC Court of Appeals

Jefferson Davis, Jr.Appellant,

v.

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

**APPELLANT’S MOTION FOR 3RD & FINAL EXTENSION OF TIME TO FILE AND
SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**

NOW COME *Pro Se* Appellant above named, on the grounds stated below, and, pursuant to Rules 208, 240 and 263 of the South Carolina Appellate Court Rules, hereby move this Honorable Court to allow him one final extension, until **Friday, February 5th, 2021**, to file / serve his initial brief and designation of matter to be included in the record on appeal.


1. By order of December 8th, 2020, the Court granted Appellant’s second motion for an extension of his initial brief / designation of matter deadline, establishing a deadline of Wednesday, January 6th, 2021.

2. Appellants recognizes the notice in the Court's December 8th order that further extension of the initial briefing / designation deadline would have to be occasioned by extraordinary circumstances.
3. This request is made in good faith, and not for purposes of delay.
4. Appellant is a *Pro Se* litigant.
5. Appellant would also like to call the courts attention the fact that he has just today, January 4th, 2021, filed an Initial Brief & Designation in a separate appeal. This appeal required additional time and research than originally expected.
6. Appellant has made significant progress in the research and preparation of his initial briefing / designation.
7. A third ***and final*** extension should provide Appellant the additional time necessary to review his filings for completeness and accuracy and is anticipated to avoid amendments or corrections to the filings in the future which would clutter the docket.
8. Appellant has also had an unusually heavy workload over the past few months / new year as complicated by COVID-19 restrictions. Appellant has also experienced extensive continued non-profit advocacy efforts for the K-12 children of South Carolina with “special needs” – an underlying topic of this case. Due to the actions (***or rather inaction & belligerence***) of the Respondents in this appeal, NO SOUTH CAROLINA CHILDREN have received scholarships for the 2020-2021 school year under the tax credit scholarship program.

[CONTINUED ON NEXT PAGE]

WHEREFORE, the undersigned would respectfully request a **final thirty-day extension until Friday, February 5th, 2020** in which to file / serve his initial brief and designation of matter to be included in the record on appeal.

Date: January 4th, 2021



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

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PROOF OF SERVICE

I certify that I have served **APPELLANT’S MOTION FOR 3RD & FINAL
EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION
OF MATTER** on the below named parties at the email addresses noted on the date below. Due
to the current coronavirus crisis, no hard copy is being mailed.

Geoffrey Kelly Chambers, Esq.
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Date: January 4, 2021



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January 4, 2021

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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Jan 04 2021

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 3RD & FINAL 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 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

cc: Geoffrey Kelly Chambers, Esq. (g.k.chambers@gmail.com & Geoffrey@cperlgroup.com),
M. Dawes Cooke, Jr., Esq. (mdc@barnwell-whaley.com), &
Justin Paul Novak, Esq. (jnovak@barnwell-whaley.com)