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Oct 22 2021

SC Court of Appeals

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

Jefferson Davis, Jr.Appellant,

v.

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

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
INITIAL REPLY BRIEF &
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rules 208, 209, 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 permission to serve and file Appellant's Initial Reply Brief & Designation of Matter outside the filing deadlines set forth by Rules 208 and 209 of the South Carolina Appellate Court Rules (SCACR).

This Motion is filed pursuant to the attached letter dated October 12th, 2021.

Date: October 22, 2021



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



EXHIBIT

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
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October 12, 2021

Jefferson Davis, Jr.
403 McCarter Avenue
Greenville SC 29615

Re: Jefferson Davis, Jr. v. Chad Connelly
Appellate Case No. 2020-001348

Dear Mr. Davis:

Our records indicate that the time for serving and filing the appellant's initial reply brief and designation of matter is overdue. Within ten (10) days from the date of this letter, you may serve and file the appellant's initial reply brief and designation of matter, along with a motion requesting permission to serve and file the appellant's initial reply brief and designation of matter outside the filing deadlines set forth by Rules 208 and 209 of the South Carolina Appellate Court Rules (SCACR). Your brief will not be considered by the Court if no motion is made within ten (10) days.

Very truly yours,

CLERK

cc: Geoffrey Kelly Chambers, Esquire
M. Dawes Cooke, Jr., Esquire
Justin Paul Novak, Esquire

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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 REPLY BRIEF & DESIGNATION OF MATTER** on the below named parties at the email addresses noted on October 22, 2021. Due to the current coronavirus crisis, no hard copy is being mailed.

Geoffrey Kelly Chambers, Esq.
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M. Dawes Cooke, Jr. &
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Date: October 22, 2021

Jefferson Davis, Jr., Appellant
403 McCarter Avenue
Greenville, SC 29615
843-901-8036 (cell)
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October 22, 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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Oct 22 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 EXTENSION OF TIME TO FILE AND SERVE INITIAL REPLY BRIEF & DESIGNATION OF MATTER** (with Proof of Service).
- 2. APPELLANT'S INITIAL REPLY BRIEF** (with Proof of Service).
- 3. DESIGNATION OF MATTER** (with Proof of Service).
- 4. RECORD ON APPEAL** (with Certification and 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, CPA (GA)
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)