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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 DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following (with exhibits) to be included in the Record on Appeal:

ORDERS

1. ORDER DENYING PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION AND DISMISSING PLAINTIFF’S SUMMONS AND COMPLAINT WITH PREJUDICE AND DENYING [DEFENDANT’S] MOTION FOR SANCTIONS **filed June 30th, 2020.**
2. ORDER DENYING PLAINTIFF’S MOTION FOR RECONSIDERATION OF ORDER, PLAINTIFF’S MOTION TO STAY 30 DAYS & SUBSTITUTE PLAINTIFF WITH STANDING, AND PLAINTIFF’S MOTION FOR PERJURY, CONTEMPT, AND SANCTIONS FOR FALSE AFFIDAVIT **filed September 28th, 2020.**
3. ORDER DENYING MOTION FOR RECONSIDERATION OF PLAINTIFF (AS TO PERJURY, CONTEMPT AND SANCTIONS) **filed October 6th, 2020.**

PLEADINGS, MOTIONS & MEMORANDA

- 4. Summons & Complaint filed February 12th, 2020.
- 5. Answer filed March 4th, 2020.
- 6. Plaintiff’s Motion for Immediate Temporary Restraining Order and Notice filed February 24th, 2020.
- 7. Affidavit of Chad Connelly filed March 4th, 2020.
- 8. Plaintiff’s Motion/Dismiss Defendants Counterclaim(s) filed March 30th, 2020.
- 9. Plaintiff’s Response in Opposition to Defendants Motion for Sanctions filed April 8th, 2020.
- 10. Plaintiffs Response in Opposition to Defendants’ Motion to Deny Preliminary Injunction and to Dismiss the Complaint filed April 8th, 2020.
- 11. Plaintiff’s Motion for Perjury Contempt & Sanctions for False Affidavit filed May 14th, 2020.
- 12. Plaintiff’s Letter, Declaration and Exhibits filed July 10th, 2020.
- 13. Plaintiff’s Notice and Motion to Reconsider filed on July 13th, 2020.
- 14. Affidavit of David Wilson filed August 4th, 2020.
- 15. Plaintiff’s Memo in Support of Motion for Perjury, Contempt & Sanctions for False Affidavit filed August 14, 2020.
- 16. Declaration of Jefferson Davis Jr filed September 17th, 2020.
- 17. Plaintiff’s Motion/Reconsider Order Plaintiff’s Motion for Perjury, Contempt & Sanctions for False Affidavit filed October 5th, 2020.

TRANSCRIPTS

- 18. Transcript of March 5th, 2020 Motion Hearing.

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

Date: October 22nd, 2021



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

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Jefferson Davis, Jr.Appellant,

v.

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

PROOF OF SERVICE

I, the undersigned Appellant does hereby certify that I have caused to be mailed and/or otherwise transmitted a copy of the below listed document(s) to the party shown below, postage prepaid, on the **22nd day of October, 2021**, as follows:

PLEADINGS: **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
Attorney for Respondents
geoffrey@cperlgroup.com
g.k.chambers@gmail.com

[CONTINUED ON NEXT PAGE.]

PROOF OF SERVICE (CONTINUED)

M. Dawes Cooke, Jr. & Justin Paul Novak
Barnwell Whaley
P.O. Drawer H
Charleston SC 29402
Attorneys for Respondents
mdc@barnwell-whaley.com
jnovak@barnwell-whaley.com

Date October, 22, 2021



Jefferson Davis, Jr., Esq.
Appellant
403 McCarter Avenue
Greenville, SC 29615
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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)