

RECEIVED

Feb 16 2022

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 TO RELAX DEADLINE AND FILE OUT OF TIME

Appellant hereby moves to relax the deadline and to accept the filing of the **Record on Appeal** out of time if such is deemed filed out of time. Appellant timely submitted the Record on Appeal via email on October 22, 2021. However, the filing was submitted as a downloadable file due to the size of the document and email limitations. Appellant was just recently informed that the Court is unable download external files. Appellant “re-filed” the Record on Appeal with conforming file sizes today, February 16, 2022. Although Appellant believes the Record on Appeal was timely filed, in an abundance of caution Appellant is also filing this Motion.

Date: February 16, 2022



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

RECEIVED

Feb 16 2022

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.

PROOF OF SERVICE

I certify that I have served **APPELLANT’S MOTION TO RELAX DEADLINE AND FILE OUT OF TIME** on the below named parties at the email addresses noted on February 16, 2022. Due to the current coronavirus Orders, no hard copy is being mailed.

Geoffrey Kelly Chambers, Esq.
CPER Law Group LLC
411 Walnut Street No. 10646
Green Cove Springs FL 32043-3443
g.k.chambers@gmail.com
geoffrey@cperlgroup.com

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

Date: February 16, 2022

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