

STATE OF SOUTH CAROLINA
COUNTY OF NEWBERRY

) IN THE COURT OF COMMON PLEAS
) EIGHTH JUDICIAL CIRCUIT
)

) C.A. NO. 2020-CP-36-00382
)

Jefferson Davis, Jr.,

Plaintiff,

vs.

Chad Connelly, Dave Wilson, Stephen
Kirkland, Tom Persons, Neil Mellen, John Doe
#1 & John Doe #2,

Defendants.

FILED
NEWBERRY COUNTY
2024 OCT 11 AM 10:22
ELIZABETH H. FULTON
CLERK OF COURT

DECLARATION OF JEFFERSON DAVIS, JR.

1. My name is Jefferson Davis, Jr. I am more than eighteen (18) years of age and competent to testify to the matters stated in this Declaration. The facts provided in this declaration are based upon my personal knowledge.
2. I am the *Pro Se* Plaintiff in the above captioned case, and I am a resident and elector of Greenville County, South Carolina.
3. The above captioned case was appealed to the South Carolina Court of Appeals and Ordered dismissed on procedural grounds on March 6th, 2024, with a Remittitur filed by the same Court on March 22nd, 2024.
4. The Remittitur was filed with the Newberry Court on March 26th, 2024.
5. Although the initial Order to pay fees was filed on January 3rd, 2023, Plaintiff Davis filed a timely Motion to Reconsider which was not ruled upon until August 24th, 2023, following which a timely appeal was filed to the SC Court of Appeals.
6. It is my understanding, and based on this Court's order delaying a previous Rule to Show Cause hearing due to the appeal, that fees were not to be paid until complete resolution of the matter and the appeal is finalized.
7. Subsequent events which began during the appeal have prevented me from being able to pay the ordered fees.
8. **Health Issues / Colon Cancer:** As the Defendants are certainly aware, in the 3rd quarter of 2023 I began suffering from severe health issues. In February of 2024, I was diagnosed with Sigmoid Colon Cancer at the Mayo Clinic in Jacksonville Florida. On March 18th, 2024, I underwent a 4 hour and 40-minute robotic surgery to remove the referenced colon cancer. Following surgery and initial recovery, I underwent substantial chemotherapy

treatment through July 5th, 2024, and is in recovery. Currently I continue to deal with these severe health / cancer issues. It has been recommended to me by two separate oncologist that I should undergo additional chemotherapy treatment at this time, and I am currently working with my colorectal surgeon to schedule a major follow-up ureter / kidney reconstructive surgery (*likely out of state*) later this year or in the first quarter of 2025.

9. **Financial Position:** Given the substantial financial costs incurred because of the above health / cancer issues, I am currently not able to pay the court ordered legal fees. I have substantial medical fees which are currently not covered by insurance. The only non-retirement assets in my name, currently and during the applicable time period, are two vehicles (a 1994 & 1996) with limited value and a basic operating checking account.
10. **Attempts to Resolve Matters:** I have made efforts to resolve matters, specifically the applicable court ordered fees in the x0382 & x0384 Newberry cases, with opposing parties. These efforts have been directed specifically with attorney Geoffery Chambers and his client Chad Connelly as the primary party in these cases via our legal counsel in a case filed by Chad Connelly against my wife Olga Lisinska and Palmetto Kids FIRST Scholarship Program, Inc. – a 501(c)(3) entity which I am Chairman of the Board. Unfortunately, these efforts have been met with opposition and without success.

It has been my experience with opposing counsel in these two cases that any efforts to resolve issues are rebuffed and communications are completely ignored. I do not believe the opposing parties wish to amicably resolve these matters, and their efforts are solely to embarrass me due to their clients opposing political views and other ulterior motives. **I have heard on many occasions over the past year and a half rumors from Chad Connelly that I am to be arrested and put in jail for not paying these fees timely.**

11. It is my intention to pay the ordered legal fees when able, and I am open to a payment plan (*as minimal as that would have to be at this time*) if the Court so Orders.

I hereby declare under the penalty of perjury that the foregoing is true and correct according to my personal knowledge, and if called as a witness, I could and would testify truthfully about the information contained in this Declaration.

This 11th day of October 2024.



JEFFERSON DAVIS, JR.
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PLAINTIFF, *PRO SE*

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