

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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MAR 31 2014

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III Circuit Court Judge

71748

Case No. 2013-CP-02-1647  
Case No. 2013-CP-02-2849  
Case No. 2013-CP-02-2850  
Case No. 2013-CP-02-2851

MICHAEL DEON BROWN, JAMES CURTIS, AND JANE DOE and JOHN DOE  
Numbers I, II, III and IV, by their proposed Guardian *ad Litem*, and Adele Pope,  
as Creditor/Proponent of Will of James Brown dated June 15, 1999 and on  
behalf of Others under S.C. Trust Code § 62-7-405 ..... Appellants,

v.

James B., Terry Brown, Tommie Rae Hynie and David Sojourner, Jr.,.....  
..... Respondents.

IN RE:  
THE ESTATE OF JAMES BROWN, A/K/A JAMES JOSEPH BROWN

NOTICE OF APPEAL

Appellant appeals the following Orders in the above matter:

1. ORDER DETERMINING PARTIES TO SEVERED OMITTED SPOUSE CLAIM, ELECTIVE SHARE CLAIM AND PRETERMITTED CHILD CLAIM of the Honorable Doyet A. Early, III dated February 7, 2014, attached hereto as Exhibit A.
2. ORDER DISMISSING CROSS-CLAIMS OF CINNAMON NICOLE PARRIS AND LaRHONDA PETTIT (Without Prejudice) of the Honorable Doyet A. Early, III dated January 8, 2014, attached hereto as Exhibit B.
3. ORDER SEVERING OMITTED SPOUSE CLAIM, ELECTIVE SHARE

CLAIM, AND PRETERMITTED CHILD CLAIM of the Honorable Early, III dated December 16, 2013, attached hereto as Exhibit C.

4. Form 4 Order of the Honorable Doyet A. Early, III dated March 10, 2014, 2014, attached hereto as Exhibit D

5. Form 4 Order of the Honorable Doyet A. Early, III dated February 24, 2014, attached hereto as Exhibit E.

6. All Orders issued as part of, and from and after the injunction imposed by Orders of the Honorable Doyet A. Early, III and the Honorable Liz Godard dated June 13, 2013 which are the subject of an appeal pending in the South Carolina Court of Appeals, affecting Appellants.

A copy of each of said Orders received by Appellants is attached hereto and made part of this Notice of Appeal.



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Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108  
Telephone: 803-413-0753  
Email: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)  
S.C. Bar No. 4501  
Attorney for Appellants

March 31, 2014

Other Parties or Counsel:

Robert N. Rosen, Esquire  
18 Broad Street, Suite 201  
Charleston, South Carolina 29401

A. Peter Shahid, Jr., Esquire  
89 Broad Street  
Charleston, South Carolina 29401

David B. Bell, Esquire  
Matthew D. Bodman  
Bell & Bell Associates  
619 Greene Street  
Post Office Box 1011  
Augusta, Georgia 30903-1011

John F. Beach, Esquire  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, South Carolina 29201

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Case No. 2013-CP-02-1647  
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MICHAEL DEON BROWN, JAMES CURTIS, AND JANE DOE and JOHN DOE  
Numbers I, II, III and IV, by their proposed Guardian *ad Litem*, and Adele Pope,  
as Creditor/Proponent of Will of James Brown dated June 15, 1999 and on  
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**PROOF OF SERVICE**

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I certify that on the 31st day of March, 2013, I have served the NOTICE OF APPEAL of Orders of the Honorable Doyet A. Early, III in the above matter on Respondents and others as shown below by depositing a copy of same in the United States Mail, postage prepaid, addressed to them or their attorneys of record as follows:

**CIRCUIT COURT JUDGE AND CLERK OF COURT ( Courtesy Copies):**

The Honorable Doyet A. Early, III  
Post Office Box 90  
Bamberg, South Carolina 29003

The Honorable Liz Godard  
Aiken County Clerk of Court  
109 Park Avenue S.E.  
P. O. Box 583  
Aiken South Carolina 29802-0583

**ATTORNEYS OF RECORD FOR RESPONDENTS OR RESPONDENTS:**

David B. Bell, Esquire  
Matthew D. Bodman, Esquire  
619 Greene Street  
Post Office Box 1011  
Augusta, Georgia 30903-1101

Robert N. Rosen, Esquire  
18 Broad Street, Suite 201  
Charleston, SC 29401

Peter Shahid, Jr., Esquire  
89 Broad Street  
Charleston, South Carolina 29401

David C. Sojourner, Jr., Esquire  
c/o John F. Beach, Esquire  
Adams and Reese, LLP  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, South Carolina 29201

**COURTESY COPY TO OTHERS:**

James M. Griffin, Esquire (Courtesy Copy)  
P. O. Box 11208  
Columbia, S.C. 29211

The Honorable Alan Wilson (Courtesy Copy)  
Attorney General of South Carolina  
P. O. Box 11549  
Columbia, South Carolina 29211

  
Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108  
Telephone: 803-413-0753  
Email: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)  
S.C. Bar No. 4501  
Attorney for Appellants

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**SC Court of Appeals**

March 31, 2014

**Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108**

March 31, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

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**SC Court of Appeals**

Re: Michael Brown and Others

Dear Ms. Kitchings:

In connection with the above-referenced action, enclosed please find an original and one copy of a Notice of Appeal of the Orders of The Honorable Doyet A. Early, III dated February 7, 2014, January 8, 2014 and December 16, 2013 and related Form 4 Orders in the above matter, together with Proof of Service.

I enclose a check to cover the filing costs of the notice.

I would appreciate your filing the original and returning a file-stamped copy with the courier who delivers this package.

Thank you for your assistance in this matter.

Sincerely,

*Adele Pope*

Adele J. Pope  
Attorney for Appellants

Enclosures

The Honorable Liz Godard  
The Honorable Doyet A. Early, III  
Robert N. Rosen, Esquire  
A. Peter Shahid, Esquire  
David Bell, Esquire  
Matthew D. Bodman, Esquire  
John F. Beach, Esquire

**Law Office of Adele J. Pope, P.C.**  
**1228 Walnut Street**  
**Newberry, South Carolina 29108**  
**803-413-0753**

March 31, 2014

Cheri L. Young, RPR  
Circuit Court Reporter  
Post Office Box 5232  
Aiken, South Carolina 29804-5232

Re: Michael Deon Brown and others by their Proposed  
Guardian *ad Litem*, and others  
Case No. 2013-CP-02- 1647  
Case No. 2013-CP-02-2849  
Case No. 2013-CP-02-2850  
Case No. 2013-CP- 02-2851  
Appeal of Orders of the Honorable Doyet A. Early, III

Dear Ms. Young:

In connection with the above-referenced appeal, this will confirm that Appellants have not received notice of hearings held since June 13, 2013, and the appealed orders do not appear to mention dates of hearings.


Court Administration advises that you are the court reporter for a number of the James Brown hearings.

In accordance with Court rules, I will confirm that I have ordered and received the transcript of the December 3, 2013 hearing, and also hearings held July 2, 2013; July 9, 2013; August 19, 2013; September 11, 2013; October 8, 2013; and November 6, 2013.

I now request that you provide me with transcripts of hearings held in any of the above matters from December 3, 2013 through today.

I will provide payment to you for these, as requested.

Thank you.

Yours very truly,  
  
Adele J. Pope  
Attorney for Appellants

cc (via mail or email):  
The Honorable Rosalyn W. Frierson, Director of Court Administration  
The Honorable The Honorable Jenny Abbott Kitchings, Clerk of Court, South Carolina  
Counsel as shown on Proof of Service

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