

77970

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
NOV 24 2015
SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

Civil Action Nos. 2013-CP-02-02849, 2013-CP-02-02850

Tommie Rae Brown,Respondent,

v.

David C. Sojourner, Jr., in his capacity as Limited Special Administrator of the Estate of James Brown, a/k/a James Joseph Brown and Limited Special Trustee of the James Brown Irrevocable Trust, u/a/d August 1, 2000, Deanna Brown Thomas, Yamma Brown, Venisha Brown, Larry Brown, Terry Brown and Daryl Brown,

of whom Michael Deon Brown is theAppellant.

NOTICE OF APPEAL

Michael Deon Brown, by and through his undersigned counsel, hereby appeals the Order of the Honorable Doyet A. Early III (the "Lower Court"), filed January 1, 2015, granting Respondent Tommie Rae Brown's ("Respondent") Motion for Summary Judgment and denying the Motion for Summary Judgment of David C. Sojourner Jr., in his capacity as Limited Special Administrator of the Estate of James Brown, a/k/a James Joseph Brown, and Limited Special Trustee of the James Brown Irrevocable Trust, u/a/d August 1, 2000. Appellant also appeals the Lower Court's Order, filed

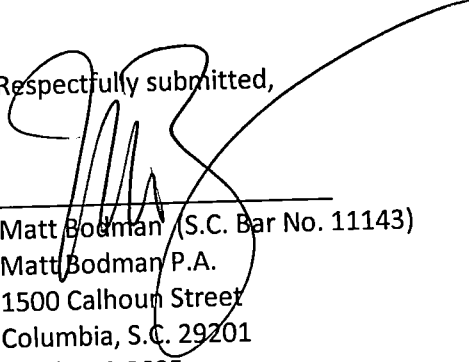
October 26, 2015, denying Appellant's and others' Motions to Alter, Amend or Reconsider (collectively, the "Orders on Appeal.")

The Orders on Appeal rule Respondent is Decedent James Joseph Brown's "surviving spouse."

Copies of the Orders on Appeal are provided herewith as Attachments A and B. Appellant is providing a copy of this Notice to the Aiken County Common Pleas Clerk of Court, the Honorable Doyet

A. Early III, and all counsel of record.

Respectfully submitted,



Matt Bodman (S.C. Bar No. 11143)
Matt Bodman P.A.
1500 Calhoun Street
Columbia, S.C. 29201
(803) 806-8605

David B. Bell (*admitted pro hac vice*)
P.O. Box 1011
Augusta, GA 30903
(706) 724-1882
Attorneys for Appellant

November 23, 2015

RECEIVED
NOV 24 2015
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

Civil Action Nos. 2013-CP-02-02849, 2013-CP-02-02850

Tommie Rae Brown,.....Respondent

v.

David C. Sojourner, in his capacity as
Limited Special Administrator and Limited
Special Trustee, Deanna Brown Thomas,
Yamma Brown, Venisha Brown, Larry
Brown, Terry Brown and Daryl Brown,

of whom Michael Deon Brown is the.....Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that he has served the Appellant's Notice of Appeal by
depositing a copy of same in the United States Mail, postage prepaid on November 24, 2015 addressed
as follows:

Robert N. Rosen, Esq.
Corey T.L. Smith, Esq.
Rosen Law Firm LLC
18 Broad Street, Suite 201
Charleston, S.C. 29401
Attorneys for Tommie Rae Brown

S. Alan Medlin
1713 Phelps Street
Columbia, S.C. 29205
Attorney for Tommie Rae Brown

Louis Levenson, Esq.
Levenson & Associates

125 Broad Street, SW
Atlanta, GA 30303
Attorney for Deanna Brown Thomas,
Yamma Brown, Venisha Brown and
Larry Brown

John A. Donsbach, Esq.
Donsbach & King, LLC
504 Blackburn Drive
Augusta, GA 30907
Attorney for Terry Brown and
Forlando Brown

William Joseph Barr, Esq.
Barr Law LLC
108 Academy Street
Kingstree, S.C. 29556-3422
Attorney for Tomya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette
Mitchell and Ciara Petit and Cherquarius
Williams for LaRhonda Petit

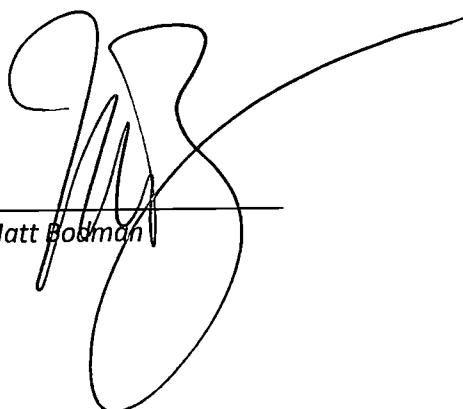
Vera Gilford, Esq.
Post Office Box 12553
Miami, FL 33101
Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown Fegan, Jeanette Mitchell,
And Ciara Petit and Cherquarius Williams
For LaRhonda Petit

John F. Beach
Adams and Reese LLP
1501 Main Street. 5th Floor
Columbia, S.C. 29201
Attorney for LSA and LST

Scott Keniley, Esq.
Keniley Kumar LLC
Two Ravinia Drive, Suite 500
Atlanta, GA 30346
Attorney for Terry Brown and
Forlando Brown

Itriss Jenkins, Esq.
Itriss J. Jenkins LLC
215 E. Bay Street, Suite 203
Charleston, S.C. 29401
Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown-Fegan, Jeanette Mitchell,
and Ciara Petit and Cherquarius Williams
for LaRhonda Petit

A. Peter Shahid Jr., Esq.
Shahid Law Office
89 Broad Street
Charleston, S.C. 29401
Attorney for Guardian Ad Litem
Stephen M. Slotchiver, for James Brown II



Matt Goodman

November 24, 2015

Matt Bodman, P.A.

Attorney at Law

1500 Calhoun Street
Columbia, South Carolina 29201

▲▼▲▼▲

Telephone (803) 806-8605 • Facsimile (803) 758-6087
matt@mattbodmanlaw.com • www.mattbodmanlaw.com

RECEIVED
NOV 24 2015
SC Court of Appeals

Tuesday, November 24, 2015

VIA HAND DELIVERY

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, S.C. 29211

RE: Estate of James Brown A/K/A James Joseph Brown
Civil Case No. 2013-CP-02-02849, 2013-CP-02-02850

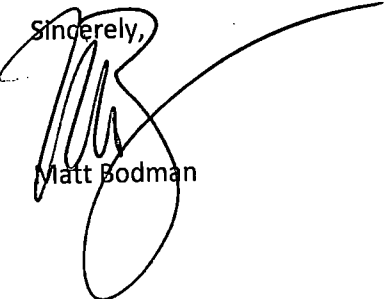
Dear Ms. Kitchings:

Enclosed is an original and copy of a Notice of Appeal in the above-referenced case with a Certificate of Service as well as a \$100 filing fee.

By copy of this letter, I am serving a copy of these documents on all attorneys of record.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,


Matt Bodman

Cc: All parties of record
The Honorable Doyet A. Early III
The Honorable Liz Godard, Aiken County Clerk of Court