

779711

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 Daryl Brown is the .....Appellant.

NOTICE OF APPEAL

Daryl 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

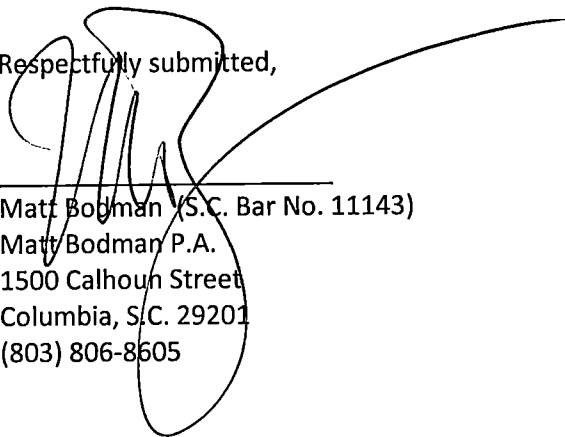
October 26, 2015, denying Appellant's and others' Motions to Alter, Amend or Reconsider (collectively, the "Orders on Appeal.")

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 24, 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 Daryl 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

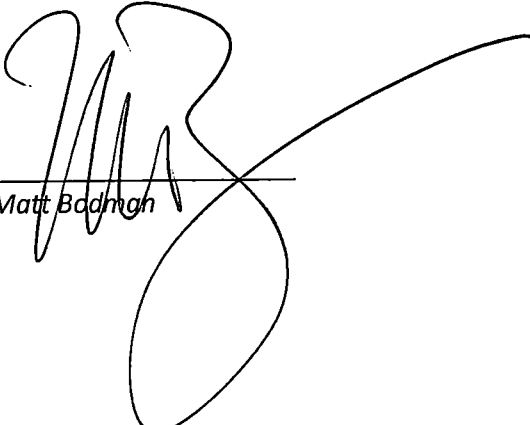
Vera Gilford, Esq.  
Post Office Box 12553  
Miami, FL 33101  
Attorney for Tonya Brown a/k/a Sarah  
LaTonya Brown Fegan, Jeanette Mitchell,  
And Ciara Petit and Cherquarius Williams  
For LaRhonda Petit

John F. Beach  
Adams and Reese LLP  
1501 Main Street. 5<sup>th</sup> 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 Badman

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