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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

RECEIVED
NOV 20 2015
SC Court of Appeals



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 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, is theAppellant.

NOTICE OF APPEAL

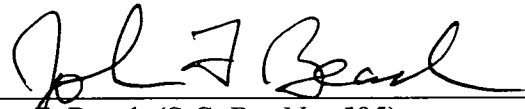
David C. Sojourner, Jr., in his capacity as Limited Special Administrator of the Estate of James Brown, a/k/a James Joseph Brown, and Limited Special Trustee of the James Brown Irrevocable Trust, u/a/d August 1, 2000 (“Appellant”), by and through his undersigned counsel, hereby appeals the order of the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

Summary Judgment. 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 Clerk of Court of the Aiken County Court of Common Pleas, the Honorable Doyet A. Early, III, and all counsel of record.

Respectfully submitted,



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November 20, 2015.

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Tommie Rae Brown,Respondent,

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David C. Sojourner, Jr., 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 David C. Sojourner, Jr., in his capacity
as Limited Special Administrator and Limited
Special Trustee, is theAppellant.

PROOF OF SERVICE

The undersigned hereby certifies that she has served the Appellant's Motion to
Certify to the South Carolina Supreme Court for Review Pursuant to Rule 204(b),
S.C.A.C.R. by depositing a copy of same in the United States Mail, postage prepaid on
November 20, 2015, and addressed as follows:

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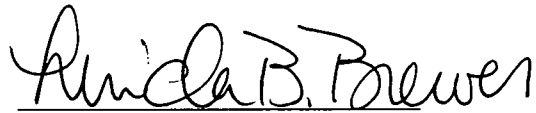
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November 20, 2015

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SC Court of Appeals

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Via Hand Delivery

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

RE: Estate of James Brown a/k/a James Joseph Brown
Civil Action Number: 2008-CP-02-1647
A&R File No. 022853-000001

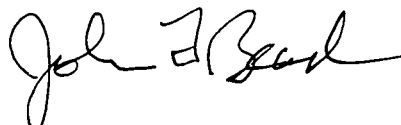
Dear Ms. Kitchings:

Enclosed for filing are an original and one copy of a Notice of Appeal in the above-referenced matter together with a Certificate of Service. Please file the original and return the clocked-in copy with our courier. Our check in the amount of \$100.00 is enclosed to cover the filing fee.

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

Thank you for your assistance in this matter. Please contact me with any questions or concerns.

Sincerely,



John F. Beach

JFB/lbb

Enclosures

cc: David C. Sojourner
All parties of Record
The Honorable Doyet A. Early, III
The Honorable Liz Godard, Aiken County Clerk of Court