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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

Appellate Case No. 2015-002417

RECEIVED

DEC 08 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

APPELLANT'S MOTION TO STAY APPELLATE COURT DEADLINES
PENDING SUPREME COURT'S RULING ON APPELLANT'S MOTION TO
CERTIFY APPEAL PURSUANT TO RULE 204(B), S.C.A.C.R.

TO: THE HONORABLE CHIEF JUDGE AND THE ASSOCIATE JUDGES OF THE
SOUTH CAROLINA COURT OF APPEALS:

Appellant David C. Sojourner, Jr., Esquire, 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, respectfully requests this Honorable Court stay all deadlines in the above-captioned appeal until such time as the South Carolina Supreme Court rules on Appellant's Motion to Certify the appeal pursuant to Rule 204(b) of the *South Carolina Appellate Court Rules*. Appellant's Motion to Certify was filed on December 1, 2015.

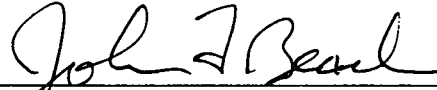
Rule 204(b), S.C.A.C.R. permits a party to an appeal to move the Supreme Court for an order transferring any pending appeal from this Court to the Supreme Court. Pursuant to Rule 240, S.C.A.C.R., governing motion practice generally, "[u]nless otherwise provided by these Rules, or ordered by the appellate court, the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition." Rule 240(b), S.C.A.C.R. Accordingly, Appellant is informed and believes all appellate court time limits and deadlines will continue to run pending the South Carolina Supreme Court's decision on Appellant's Motion to Certify.

Staying all appellate court deadlines until the Supreme Court rules on Appellant's Motion to Certify would save judicial resources, time, and costs. The requested stay will avoid the confusion and inefficiencies caused by conflicting filing and briefing deadlines that will likely result in the event the Supreme Court grants Appellant's Motion to Certify.

For the foregoing reasons, Appellant respectfully requests that this Honorable Court stay all deadlines in the *South Carolina Appellate Court Rules* pursuant to Rule

240(b), S.C.A.C.R., until the South Carolina Supreme Court issues an order on Appellant's Motion to Certify.

Respectfully submitted,



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Attorneys for Appellant

December 8, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

DEC 08 2015

Doyet A. Early III, Circuit Court Judge

SC Court of Appeals

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 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

PROOF OF SERVICE

The undersigned hereby certifies that he has served the foregoing Appellant's Motion to Stay Appellate Court Deadlines Pending Supreme Court's Ruling on Appellant's Motion to Certify Appeal Pursuant to Rule 204(B), S.C.A.C.R. by depositing a copy of same in the United States Mail, postage prepaid on December 8, 2015 and addressed as follows:

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for LaRhonda Petitt*

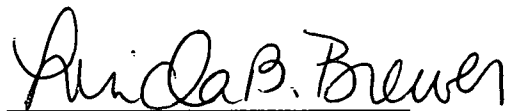
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December 8, 2015

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Via Hand Delivery

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

SC Court of Appeals

In Re: The Estate of James Brown a/k/a James Joseph Brown
Tommie Rae Brown v. David C. Sojourner, Jr., et al.
Appellate Case No. 2015-002417
A&R File No. 022853-000001

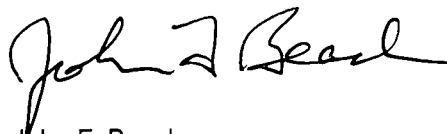
Dear Ms. Kitchings:

Enclosed for filing is an original and seven (7) copies of the Appellant's Motion to Stay Appellate Court Deadlines Pending Supreme Court's Ruling on Appellant's Motion to Certify Appeal Pursuant to Rule 204(B), S.C.A.C.R. in the above-referenced matter together with a Proof of Service. Please file the original and six copies and return the extra clocked-in copy with our courier. Our check in the amount of \$25.00 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