

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 29 2015

SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

Appellate Case No. 2015-002417

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 FOR AN EXTENSION
OF TIME TO FILE INITIAL BRIEF

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, hereby moves for a thirty-day extension of time to file and serve the Appellant's Initial Brief and Designation of Matter to be Included in the Record on

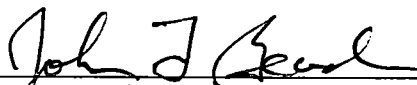
Appeal. Appellant's Initial Brief is currently due on or before January 6, 2016.

Appellant seeks additional time to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal due to the pending motions before this Court and the Supreme Court, including the LSA's Motion to Certify the Appeal to the South Carolina Supreme Court pursuant to Rule 204(b) of the *South Carolina Appellate Court Rules*, filed December 1, 2015, and the LSA's Motion to Stay Appellate Court Deadlines pending the Supreme Court's decision on the LSA's Motion to Certify, filed on December 8, 2015. The LSA hereby expressly incorporates all arguments previously made in filings with this Court and the Supreme Court in support of the instant motion.

Accordingly, for reasons previously stated, and in the interest of judicial economy, Appellant respectfully requests thirty (30) additional days to file his Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal.

Counsel for Appellant has consulted with counsel for all other parties to this appeal and has been informed that no party will assert any objection to this motion.

Respectfully submitted,



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Attorneys for Appellant David C. Sojourner, Jr., Limited Special Administrator of the Estate of James Brown and Limited Special Trustee of the James Brown Irrevocable Trust, u/a/d August 1, 2000

December 28, 2015.

THE STATE OF SOUTH CAROLINA
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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

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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 the.....Appellant

PROOF OF SERVICE

The undersigned hereby certifies that he has served the foregoing Appellant's Motion for an Extension of Time to File Initial Brief by depositing a copy of same in the United States Mail, postage prepaid on December 28, 2015 and addressed as follows:

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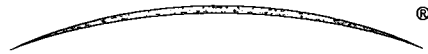


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December 28, 2015

ADAMS AND REESE LLP



December 28, 2015

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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

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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 for an Extension of Time to File Initial Brief 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/ibb

Enclosures

cc: David C. Sojourner
All parties of Record

Adams and Reese, LLP
Runner Errand Request

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DEC 29 2015

SC Court of Appeals

From: John F. Beach

Date of Request: 12/28/15

Date Needed: 12/28/15 Time Needed: 4:00

Destination (include name and address):

SC Court of Appeals

Additional Instructions:

File attached with Court of Appeals and return file-stamped copy to Liz D.

Client/Matter #: 022853-000001

Charge Client \$2 Runner Fee (in addition to mileage)? YES NO

ERRANDS WITHOUT CLIENT/MATTER NUMBERS WILL BE RETURNED TO THE REQUESTOR.