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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

RECEIVED

Doyet A. Early, III, Circuit Court Judge

DEC 29 2015

SC Court of Appeals

Appellate Case No. 2015-002417

In Re: The Estate of James Brown a/k/a James Joseph Brown

Tommie Rae Brown, Respondent,

v.

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, Respondents below,

Of whom David C. Sojourner, Jr., in his capacity as Limited Special Administrator and Limited Special Trustee, Deanna Brown-Thomas, Yamma Brown, Venisha Brown, Terry Brown, Michael Deon Brown and Daryl Brown are the Appellants.

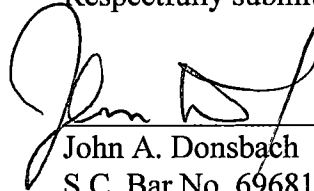
**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF,
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL, AND PROOF OF SERVICE THEREOF AND TO HOLD FILING
DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER
DECIDING THE MOTION ON THE MERITS**

Appellant Terry Brown hereby moves for an extension of time for filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof on the Respondent in the above-captioned case. To date, Appellant has

not requested an extension of time for any filing. Due to the press of counsel's caseload, the nature and extent of the issues to be discussed in the Initial Brief, and the pending Motion to Stay and Motion to Certify, counsel for Appellant requests additional time to complete the Initial Brief and Designation of Matter to be Included in the Record on Appeal, Counsel therefore requests a thirty-day (30) extension of time such that the Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof would be due on Friday, February 5, 2016. While this motion is pending, Appellant requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Appellant's counsel has conferred with counsel for all other Appellants and Counsel for Respondent, who have graciously consented to the extension of time requested herein.

December 15, 2015

Respectfully submitted,



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In the Court of Appeals

APPEAL FROM AIKEN COUNTY
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Doyet A. Early, III, Circuit Court Judge

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v.

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Of whom David C. Sojourner, Jr., in his capacity as Limited Special Administrator and Limited Special Trustee, Deanna Brown-Thomas, Yamma Brown, Venisha Brown, Terry Brown, Michael Deon Brown and Daryl Brown are the Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on December 28, 2015, he has caused a copy of the Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits addressed as follows:

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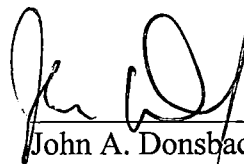
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December 28, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: Estate of James Brown a/k/a James Joseph Brown
Tommie Rae Brown, Respondent v. David C. Sojourner, Jr., et al.
Appellate Case No. 2015-002417
Civil Action No.: 2013-CP-02-2849 and 2013-CP-02-2850
C/M No.: 2497/1

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits in the above-referenced case. Also enclosed please find our firm's check in the amount of \$25 for the filing fee. Please file the original and six copies and return one copy to me in the enclosed self-addressed, stamped envelope. If you have any questions, please feel free to contact me. Thank you.

Sincerely,


John A. Donsbach

JAD/djg
Enclosures

cc: Robert N. Rosen, Esq. (w/ encl.)
Corey T. L. Smith, Esq. (w/ encl.)
John F. Beach, Esq. (w/ encl.)
Lyndey Ritz Zwingelberg, Esq. (w/ encl.)
Louis Levenson, Esq. (w/ encl.)
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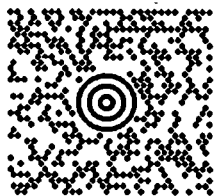
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1 OF 1

SHIP TO:

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SOUTH CAROLINA COURT OF APPEALS
1015 SUMTER STREET
COLUMBIA SC 29201-3726



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UPS NEXT DAY AIR

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Reference#1: 2497/1

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