

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2015-002417

RECEIVED
DEC 29 2015
SC Court of Appeals

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 JOINING THE LIMITED SPECIAL
ADMINISTRATOR'S MOTION TO CERTIFY AND REPLY TO
RESPONDENT'S RETURN TO MOTION TO CERTIFY**

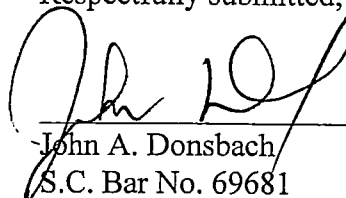
Appellant Terry Brown requests that the South Carolina Supreme Court certify the above-captioned consolidated appeal pursuant to Rule 204(b), SCACR.

Appellant agrees with the LSA that this appeal presents legal issues of significant public interest and of major importance and is appropriate for certification by the

Supreme Court. Further, the LSA's statements in his Motion and Reply that the orders granting summary judgment and denying Appellants' Motions to Vacate, Alter or Amend are final orders is undeniably correct as such orders fully adjudicate the marital status of Petitioner which is a fundamental gateway issue in the underlying matter that has been determined as a matter of law by the lower court. Finally, as this Court is fully aware, and as stated in Appellant's motion, litigation over Mr. Brown's estate has been ongoing for nearly nine (9) years. Accordingly, Appellant joins in the LSA's Motion to Certify and Reply to Respondent's Return to Motion to Certify and respectfully requests this Court expedite its decision thereon.

December 18, 2015

Respectfully submitted,



John A. Donsbach
S.C. Bar No. 69681
Donsbach & King, LLC
P.O. Box 212139
Martinez, Georgia 30917
Telephone: (706) 650-8750
Facsimile: (706) 651-1399
Email: jdonsbach@donsbachking.com
Attorney for Appellant Terry Brown

Other counsel and parties of record:

Robert N. Rosen, Esq.
Corey T. L. Smith, Esq.
Rosen Law Firm, LLC
18 Broad Street, Suite 201
Charleston, SC 29401
Attorney for Tommie Rae Brown

John F. Beach, Esq.
Lyndey Ritz Zwingelberg, Esq.
Adams and Reese LLP
1501 Main Street, Fifth Floor
Columbia, SC 29201
Attorney for David C. Sojourner, Jr.,
Limited Special Administrator and
Limited Special Trustee

Louis Levenson, Esq.
Levenson & Associates
125 Broad Street, SW
Atlanta, GA 30303
Attorney for Deanna Brown Thomas,
Yamma Brown, Venisha Brown
and Larry Brown

Robert C. Byrd, Esq.
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
Attorney for Deanna Brown-Thomas,
Dr. Yamma Brown, and Venisha Brown

Arnold S. Goodstein, Esq.
P.O. Box 2350208 Sumter Avenue
Summerville, SC 29484-2350
Attorney for Tommie Rae Brown

Matthew D. Bodman, Esq.
Matt Bodman, P.A.
1500 Calhoun Street
Columbia, SC 29201
Attorney for Larry Brown, Daryl Brown
and Michael Deon Brown

David B. Bell, Esq.
Law Offices of David B. Bell
619 Greene Street
Augusta, GA 30903-1011
Attorney for Daryl Brown, Michael Deon Brown
and Lisa Sims

William J. Barr, Esq.
108 N. Academy St.
Kingstree, SC 29556
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

Vera Gilford, Esq.
P.O. Box 12553
Miami, FL 33101
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

J. David Black, Esq.
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, SC 29201
Attorney for Russell Bauknight

C. Havird Jones, Jr., Esq.
Office of the SC Attorney General
P.O. Box 11549
Columbia, SC 29211-1549

James Mixon Griffin, Esq.
Griffin & Davis Law Firm
1527 Blanding Street
Columbia, SC 29201

S. Alan Medlin, Esq.
1713 Phelps Street
Columbia, SC 29205
Attorney for Tommie Rae Brown

T. Heyward Carter, Jr., Esq.
Evans, Carter, Kumes & Bennett, PA
115 Church Street
P.O. Box 369
Charleston, SC 29401
Attorney for Tommie Rae Brown

David L. Michel, Esq.
15 State Street
Charleston, SC 29401
Attorney for Tommie Rae Brown

Itriss J. Jenkins, Esq.
Itriss J. Jenkins, LLC
215 E. Bay St., Suite 203
Charleston, SC 29401
Attorney for Respondents Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

A. Peter Shahid, Jr., Esq.
Shahid Law Office, LLC
89 Broad Street
Charleston, SC 29401
Attorney for Guardian ad Litem
Stephen M. Slotchiver

Steven M. Slotchiver, Esq.
44 State Street
Charleston, SC 29401
Guardian ad Litem for James Brown, II

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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 18, 2015, he has caused a copy of the Motion Joining the Limited Special Administrator's Motion to Certify to be served upon all parties of record by mailing a copy of the Motion Joining the Limited Special Administrator's Motion to Certify addressed as follows:

Robert N. Rosen, Esq.
Corey T. L. Smith, Esq.
Rosen Law Firm, LLC
18 Broad Street, Suite 201
Charleston, SC 29401
Attorney for Tommie Rae Brown

John F. Beach, Esq.
Lyndey Ritz Zwingelberg, Esq.
Adams and Reese LLP
1501 Main Street, Fifth Floor
Columbia, SC 29201
Attorney for David C. Sojourner, Jr.,
Limited Special Administrator and
Limited Special Trustee

Louis Levenson, Esq.
Levenson & Associates
125 Broad Street, SW
Atlanta, GA 30303
Attorney for Deanna Brown Thomas,
Yamma Brown, Venisha Brown
and Larry Brown

Robert C. Byrd, Esq.
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
Attorney for Deanna Brown-Thomas,
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Arnold S. Goodstein, Esq.
P.O. Box 2350208 Sumter Avenue
Summerville, SC 29484-2350
Attorney for Tommie Rae Brown

Matthew D. Bodman, Esq.
Matt Bodman, P.A.
1500 Calhoun Street
Columbia, SC 29201
Attorney for Larry Brown, Daryl Brown
and Michael Deon Brown

David B. Bell, Esq.
Law Offices of David B. Bell
619 Greene Street
Augusta, GA 30903-1011
Attorney for Daryl Brown, Michael Deon Brown
and Lisa Sims

William J. Barr, Esq.
108 N. Academy St.
Kingstree, SC 29556
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

Vera Gilford, Esq.
P.O. Box 12553
Miami, FL 33101
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

J. David Black, Esq.
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, SC 29201
Attorney for Russell Bauknight

C. Havird Jones, Jr., Esq.
Office of the SC Attorney General
P.O. Box 11549
Columbia, SC 29211-1549

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Griffin & Davis Law Firm
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Columbia, SC 29201

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1713 Phelps Street
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Attorney for Tommie Rae Brown

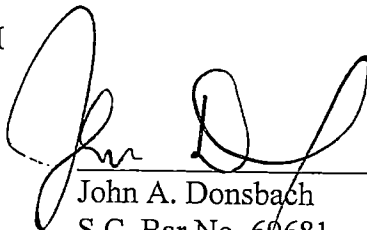
T. Heyward Carter, Jr., Esq.
Evans, Carter, Kumes & Bennett, PA
115 Church Street
P.O. Box 369
Charleston, SC 29401
Attorney for Tommie Rae Brown

David L. Michel, Esq.
15 State Street
Charleston, SC 29401
Attorney for Tommie Rae Brown

Itriss J. Jenkins, Esq.
Itriss J. Jenkins, LLC
215 E. Bay St., Suite 203
Charleston, SC 29401
Attorney for Respondents Tonya Brown a/k/a
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Shahid Law Office, LLC
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Charleston, SC 29401
Attorney for Guardian ad Litem
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Steven M. Slotchiver, Esq.
44 State Street
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John A. Donsbach
S.C. Bar No. 69681
Donsbach & King, LLC
P.O. Box 212139
Martinez, Georgia 30917
Telephone: (706) 650-8750
Facsimile: (706) 651-1399
Email: jdonsbach@donsbachking.com
Attorney for Appellant Terry Brown

DONSBACH & KING, LLC

ATTORNEYS AT LAW

John A. Donsbach (AL, GA, SC)
J. Brian King (DC, GA, SC)
Judith M. Becker (GA)

Street Address:

504 Blackburn Drive
Augusta, GA 30907

Mailing Address:

P.O. Box 212139
Martinez, GA 30917-2139

Of Counsel:

David K. Anderson, P.C. (GA)

www.donsbachking.com

Telephone (706) 650-8750

December 18, 2015

The Honorable Daniel E. Shearouse, Clerk
Supreme Court of South Carolina
Supreme Court Building
P.O. Box 11330
Columbia, SC 29211

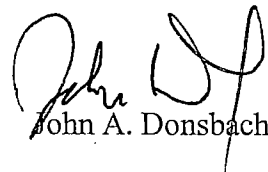
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C/M No.: 2497/1

Dear Mr. Shearouse:

Please find enclosed the original and seven (7) copies of Motion Joining the Limited Special Administrator's Motion to Certify and Reply to Respondent's Return to Motion to Certify 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.

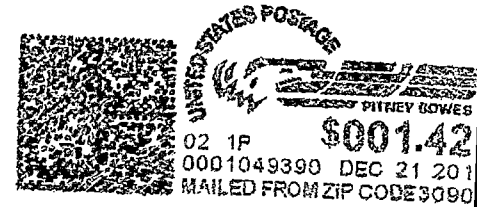
Sincerely,


John A. Donsbach

JAD/mks
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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Itriss J. Jenkins, Esq. (w/ encl.)
A. Peter Shahid, Jr., Esq. (w/ encl.)
Steven M. Slotchiver, Esq. (w/ encl.)

~~Honorable Judge Robert G. Leake~~



First Class Mail

DONSBACH & KING, LLC
P.O. Box 212139
Martinez, GA 30917-2139
Telephone (706) 650-8750

TO:

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

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