

79052

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

MAR 24 2016

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 the.....Appellant

APPELLANT DAVID C. SOJOURNER, JR.'S SECOND¹ 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

¹ While this is Appellant's second motion for an extension, the Court neither granted nor denied Appellant's first motion because it had stayed the filing deadlines pending the Supreme Court's ruling on Appellant's motion to certify.

serve the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal. Pursuant to this Court's Order filed March 10, 2016, and correspondence enclosing same, Appellant's Initial Brief is currently due on or before April 11, 2016.

Appellant seeks additional time due to the significance of the legal issues involved in this appeal, and the burden of Appellant's counsel's caseload and other deadlines. Accordingly, Appellant respectfully request thirty (30) additional days to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal. Based upon this requested extension, Appellant's new deadline is May 11, 2016.

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,



John F. Beach
Lyndey Ritz Zwingelberg
Adams and Reese LLP
1501 Main Street, 5th Floor
Post Office Box 2285 (29201)
Columbia, South Carolina 29202
(803) 254-4190

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

March 23, 2016.

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

MAR 24 2016

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

PROOF OF SERVICE

The undersigned hereby certifies that she has served the foregoing Appellant's Second Motion for an Extension of Time to File Initial Brief by depositing a copy of same in the United States Mail, postage prepaid on March 24, 2016 and addressed as follows:

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

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

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

Matthew Day Bodman, Esq.
Matt Bodman, PA
1500 Calhoun Street
Columbia SC 29201
Attorney for Daryl Brown

William Joseph Barr, Esq.
Barr Law LLC
108 N. Academy Street
Kingstree SC 29556-3422
*Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

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

Vera Gilford, Esquire
Post Office Box 12553
Miami, Florida 33101
*Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

David B. Bell, Esq.
David Bell Law Firm
619 Greene Street
Augusta GA 30903
*Attorney for Daryl Brown, Michael Deon
Brown and Lisa Sims*

John A. Donsbach, Esq.
Donsbach & King, LLC
504 Blackburn Drive
Augusta GA 30907
*Attorney for Terry Brown and Forlando
Brown*

Itriss Jenkins, Esquire
Itriss J. Jenkins, LLC
215 E. Bay Street, Suite 203
Charleston, SC 49401
*Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

Robert C. Byrd, Esquire
Parker Poe Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

Amber B. Carter, Esquire
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, SC 29201
*Attorneys for Appellants, Deanna Brown-
Thomas, Dr. Yamma Brown and Venisha
Brown*

Linda B. Brewer

Linda B. Brewer
Paralegal for Adams and Reese LLP

1501 Main Street, Fifth Floor
Post Office Box 2285 (29202)
Columbia, South Carolina 29201
(803) 254-4190
Attorneys for Appellant

March 24, 2016

March 24, 2016

Attorneys at Law
Alabama
Florida
Louisiana
Mississippi
South Carolina
Tennessee
Texas
Washington, DC

John F. Beach
Direct: 803.343.1269
E-Fax: 803.343.1224
john.beach@arlaw.com

Via Hand Delivery

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

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

RECEIVED

MAR 24 2016

SC Court of Appeals

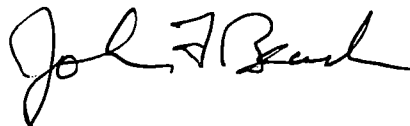
Dear Ms. Kitchings:

Enclosed for filing is an original and seven (7) copies of the Appellant's Second 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/lbb

Enclosures

cc: David C. Sojourner
All parties of Record