

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
APR 11 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, 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.

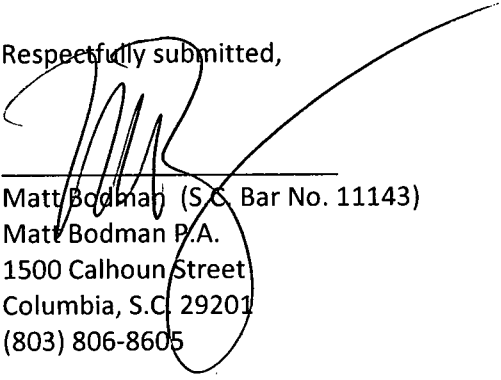
INITIAL BRIEF OF APPELLANT DARYL BROWN

Daryl Brown, by and through his undersigned counsel, adopts all of the initial brief pursuant to SCACR 208(b)(6) of Appellant 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 Estate of the James Brown Irrevokable Trust.

In the event that this Court does not allow Appellant Daryl Brown to adopt in full

Appellant David C. Sojourner's initial brief, then Appellant Daryl Brown in the alternative hereby adopts all of the initial brief previously filed by Appellant Terry Brown pursuant to SCACR 208(b)(6).

Respectfully submitted,



Matt Bodman (S.C. Bar No. 11143)
Matt Bodman P.A.
1500 Calhoun Street
Columbia, S.C. 29201
(803) 806-8605

David B. Bell (*admitted pro hac vice*)
P.O. Box 1011
Augusta, GA 30903
(706) 724-1882
Attorneys for Appellant

April 11, 2016

9

IN 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

APR 11 2016

SC Court of Appeals

Tommie Rae Brown,.....Respondent

v.

David C. Sojourner, 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.

PROOF OF SERVICE

The undersigned hereby certifies that he has served the Initial Brief of Appellant Daryl Brown by
depositing a copy of same in the United States Mail, postage prepaid on Monday April 11, 2016
addressed as follows

Robert N. Rosen, Esq.
Erin C. Casey, Esq.
Rosen Law Firm LLC
18 Broad Street, Suite 201
Charleston, S.C. 29401
Attorneys for Tommie Rae Brown

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

*Amber B. Carter, Esq.
Robert C. Byrd, Esq.
Parker Pose Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, SC 29201
Attorney for Deanna Brown Thomas,
Yamma Brown, Venisha Brown and
Larry Brown*

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

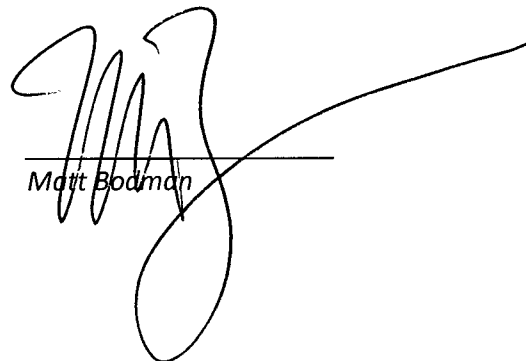
*William Joseph Barr, Esq.
Barr Law LLC
108 Academy Street
Kingstree, S.C. 29556-3422
Attorney for Tomya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette
Mitchell and Ciara Petit and Cherquarius
Williams for LaRhonda Petit*

*Vera Gilford, Esq.
Post Office Box 12553
Miami, FL 33101
Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown Fegan, Jeanette Mitchell,
And Ciara Petit and Cherquarius Williams
For LaRhonda Petit*

*John F. Beach
Adams and Reese LLP
1501 Main Street. 5th Floor
Columbia, S.C. 29201
Attorney for LSA and LST*

*Itriss Jenkins, Esq.
Itriss J. Jenkins LLC
215 E. Bay Street, Suite 203
Charleston, S.C. 29401
Attorney for Tonya Brown a/k/a Sarah
LaTonya Brown-Fegan, Jeanette Mitchell,
and Ciara Petit and Cherquarius Williams
for LaRhonda Petit*

*A. Peter Shahid Jr., Esq.
Shahid Law Office
89 Broad Street
Charleston, S.C. 29401
Attorney for Guardian Ad Litem
Stephen M. Slotchiver, for James Brown II*


Matt Bodman

April 11, 2016

9

Matt Bodman, P.A.

Attorney at Law

1500 Calhoun Street
Columbia, South Carolina 29201



Telephone (803) 806-8605 • Facsimile (803) 758-6087
matt@mattbodmanlaw.com • www.mattbodmanlaw.com

RECEIVED
APR 11 2016
SC Court of Appeals

Monday, April 11, 2015

VIA HAND DELIVERY

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

RE: Estate of James Brown A/K/A James Joseph Brown
Tommie Rae Brown v. David C. Sojourner et al
Appellate Case No. 2015-002417
Civil Case No. 2013-CP-02-02849, 2013-CP-02-02850

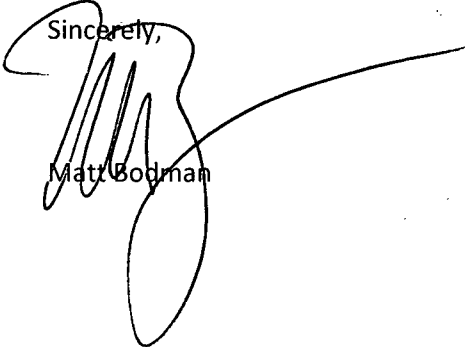
Dear Ms. Kitchings:

Enclosed is an original and copy of Initial Brief of Appellant and Proof of Service and Designation of Matter to be Included in the Record on Appeal and Proof of Service.

By copy of this letter, I am serving a copy of these documents on all attorneys of record.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Matt Bodman

Cc: All parties of record