

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

Case Nos. 2013-CP-02-02849, 2013-CP-02-02850

Appellate Case No. 2015-002417

RECEIVED

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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, Deana 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.

AFFIDAVIT OF ROBERT N. ROSEN IN SUPPORT OF MOTION
TO EXCEED PAGE LIMITATION FOR INITIAL BRIEF

PERSONALLY APPEARED before me, Robert N. Rosen, who being duly sworn, does state as follows:

1. I am counsel for Respondent Tommie Rae Brown in the above-captioned action and submit this affidavit in support of Respondent's Motion to Exceed Page Limitation for Initial Brief.

2. A total of five briefs have been filed by Appellants. David C. Sojourner's Initial Brief, in his capacity as the 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 twenty-eight (28) pages in length; Deanna Brown, Yamma Brown, and Venisha Brown's Initial Brief is thirty-nine (39) pages long; Terry Brown's Initial Brief is fifty (50) pages; and Daryl Brown and Michael Deon Brown simply adopt the other briefs. This is a total of 117 pages of briefs that have been filed against Respondent Tommie Rae Brown for which she now has to respond.

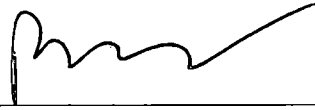
3. Deponent consulted with counsel for all other parties to this appeal via email requesting that they confirm consent to Respondent's request to exceed page limitations or state his or her objection by 5 p.m. on Thursday, June 2, 2016. Counsel for David C. Sojourner, Terry Brown, Deanna Brown-Thomas, Yamma Brown, Venisha Brown, Daryl Brown, and Michael Deon Brown consented to Respondent's request with an understanding that Respondent would consent to their motions for an extension to time to reply. Deponent is agreeable to that and consents to an extension for their reply briefs.

4. Deponent believes that a fifty (50) page extension is a reasonable and appropriate number of pages for Respondent to adequately and fully respond to all five of Appellants' initial briefs in a single initial brief given the complexity of the issues and total length of all five initial briefs filed on behalf of the Appellants.

5. I am over the age of twenty-one (21) years and am competent to testify to the matters stated herein. I have read the foregoing paragraphs and hereby declare under penalties of perjury that all matters stated therein are correct and true and are based upon my own personal knowledge and belief, except those alleged on information and belief

and as to those, I believe them to be true and accurate.

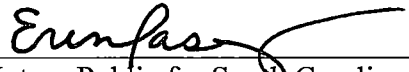
FURTHER AFFIANT SAYETH NOT.



Robert N. Rosen, Esquire

SWORN to before me this

3 day of June, 2016



Notary Public for South Carolina

My commission expires: 3/17/2026

