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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

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.

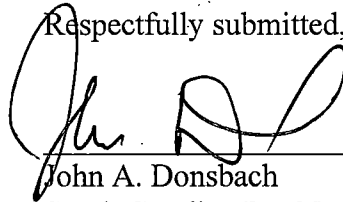
MOTION FOR EXTENSION TO FILE AND SERVE REPLY BRIEF AND PROOF OF SERVICE THEREOF AND TO HOLD FILING DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION ON THE MERITS

Appellant Terry Brown hereby moves the Court for an additional twenty (20) days beyond the normal ten (10) day time limit for Appellants to file Reply Briefs to Respondent's Initial Brief and hold filing deadlines in abeyance until such time as this and the other pending motions before the Court are decided. Because of the complexity of the legal issues involved,

Appellant's counsel's schedule and workload, and the pending motions of Respondent to exceed the page limits by fifty pages (to which Appellant Terry Brown has consented in exchange for Respondent's agreement to grant the additional twenty (20) days requested herein), and Respondent's Motion to Strike, Appellant Terry Brown respectfully requests that the deadline for Appellants to file any Reply Brief in this matter be extended to thirty (30) days after the date that Respondent is required to file her Initial Brief. Appellant has conferred with other counsel in this matter and they have all consented to this Motion.

July 1, 2016.

Respectfully submitted,



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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 July 1, 2016, he has caused a copy of the Motion for Extension to File and Serve Reply Brief 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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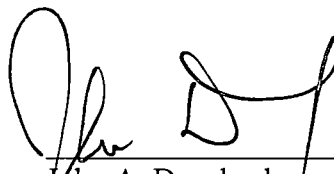
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July 1, 2016

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South Carolina Court of Appeals
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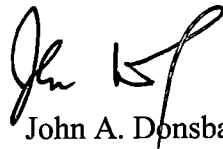
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Tommie Rae Brown, Respondent v. David C. Sojourner, Jr., et al.
Appellate Case No. 2015-002417
Civil Action No.: 2013-CP-02-2849 and 2013-CP-02-2850

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 Reply Brief 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.)
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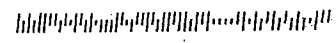
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