

EXHIBIT C

Consent Order to Dismiss Claims of Petitioners Vanisha Brown, Larry Brown, Deanna J. Brown Thomas, Jason Brown Lewis and Yamma N. Brown Lumar, Individually and on behalf of her minor children Sydney Lumar and Carrington Lumar With Prejudice

FILED 127 15 20

L. H. Hester
C.C.P. & G.S.

Anita Knepper
Deputy Clerk

STATE OF SOUTH CAROLINA

COUNTY OF AIKEN

IN THE COURT OF COMMON PLEAS
FOR THE SECOND JUDICIAL CIRCUIT

CASE NO. 2008-CP-02-1647

**CONSENT ORDER TO DISMISS CLAIMS
OF PETITIONERS VANISHA BROWN,
LARRY BROWN, DEANNA J. BROWN
THOMAS, JASON BROWN LEWIS,
AND YAMMA N. BROWN LUMAR,
INDIVIDUALLY AND ON BEHALF OF
HER MINOR CHILDREN SYDNEY LUMAR
AND CARRINGTON LUMAR WITH
PREJUDICE**

IN RE:

**THE ESTATE OF JAMES BROWN
A/K/A JAMES JOSEPH BROWN**

This matter is before the Court upon the joint motion to dismiss filed by Petitioners Vanisha Brown, Larry Brown, Deanna J. Brown Thomas, Jason Brown Lewis, and Yamma N. Brown Lumar, individually and on behalf of her minor children Sydney Lumar and Carrington Lumar ("Petitioners"); Respondent the Estate of James Brown ("Estate"), by and through its Personal Representative and Special Administrator Russell L. Bauknight and its Limited Special Administrator, David C. Sojourner, Jr.; and Respondent the James Brown Irrevocable Trust, established by the Irrevocable Trust Agreement, dated August 1, 2000 ("Trust"), by and through its Trustee and Special Trustee, Russell L. Bauknight and its Limited Special Trustee, David C. Sojourner, Jr. (Petitioners, Estate and Trust, collectively, the "Moving Parties").

The Moving Parties request and consent that this Court dismiss with prejudice Petitioners' Petition to Set Aside Informal Probate and Petition to Set Aside Trust Agreement filed on December 26, 2007, and amended January 24, 2008 ("Petitions"), together with all related claims or causes of action asserted by Petitioners to set aside the Will and/or Trust, pursuant to Rule 41 of the *South Carolina Rules of Civil Procedure*. The Moving Parties agree to bear their own costs and expenses associated with this action.

Based on the motion and consent of the Moving Parties, the Court hereby grants the Joint Motion to Dismiss. Accordingly, all claims asserted by Petitioners in the Petitions, together with all related claims or causes of action asserted by Petitioners to set aside the Will and/or Trust, are hereby dismissed with prejudice, and Petitioners are hereby dismissed as parties to the above-captioned action.

IT IS SO ORDERED.

Doyet A. Early III, Circuit Court Judge
Second Judicial Circuit

November ____, 2015.

_____, South Carolina.

[SIGNATURES OF MOVING PARTIES AND COUNSEL ON FOLLOWING PAGES]

SIGNATURE PAGE

(1 of 7)

I So Move and Consent:

Deanna B. Thomas (Attorney In Fact) for
Vanisha Brown
Vanisha Brown

Date: 11/6/15

Louis Levenson 11/13/15
Louis Levenson
Counsel for Vanisha Brown

STATE OF GEORGIA
COUNTY OF RICHMOND

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENT:

1.
I, Vanisha Beard, grant unto the said Deanna B. Thomas residing at 831 Silver Bluff Rd Aiken, SC 29803, as my lawful ATTORNEY-IN-FACT the full power to make savings or checking deposits, withdrawals, or other necessary banking transactions according to his discretion. I further authorize him to open or close accounts that may be necessary, to have the authority to enter my safe deposit box or boxes and to do whatever other acts might be necessary to carry on my personal affairs and business affairs in connection with any matters as I would do if I were personally present.

2.
I grant unto the said Deanna B. Thomas the full power and authority to list, sell, or contract to sell any property, real or personal, specifically including, but not limited to stocks, bonds, securities or other assets, wherever located and of whatever kind and nature, that I may own or that I may have or claim an interest in, and furthermore that this power and authority may be carried without the requirement of any bond, surety, appraisal, return, accounting, publication or Order of any Court or tribunal. I further grant unto the said Deanna B. Thomas the full power and authority to list, sell or contract to sell any business interest I may hold.

3.
If I have omitted any property or right I may have in the paragraphs above, it is my intention by this paragraph and by this entire document taken as a whole to grant unto my said attorney in fact the full power to do whatever she in her discretion determines is necessary with respect to my assets. I specifically authorize my attorney in fact to hire any attorneys, accountants, bookkeepers or others to provide assistance to my attorney in fact to manage and control my financial affairs and I further authorize my attorney in fact to pay such individuals from my funds in such amounts as my attorney in fact deems necessary and proper. My attorney in fact is authorized to hire medical, psychological and/or psychiatric specialists to evaluate and/or treat me for any

problems or conditions that my attorney in fact, in her sole discretion, believes are necessary and furthermore, my attorney in fact may pay such professionals or medical practitioners from my funds.

4.

I grant unto my said attorney in fact Deanna B. Thomas the full power to place any funds she deems necessary into his business or personal account or other account and to draw therefrom for my needs as she deems appropriate. If such account or accounts are not available or are otherwise inappropriate, then I authorize my said attorney to make whatever arrangements she deems necessary to carry out my wishes and conduct my financial, business and personal affairs.

5.

I hereby authorize my said attorney Deanna B. Thomas to pay from my assets or from whatever source she desires all of my debts that have matured or that may mature as time goes on. Furthermore, she shall pay all lawful bills for medical expenses, room, board, upkeep and assistance, including medical and para-medical treatment, and, furthermore, shall have the authority to incur bills, charges, expenses and costs and may pay same on my behalf when she so desires. My said attorney shall have the authority to pay all taxes, liens and any other charges against me or against my estate that may already be in existence or that may come into existence.

6.

My said attorney shall have the full power to collect any amounts due to me or to my estate including, but not limited to, accounts receivable, debts from others, Social Security payments, SSI payments, if applicable, and any other amounts that may become due as time goes on.

7.

It is understood and agreed that my attorney in fact shall have the authority to retain legal counsel for me and to pay said counsel any amount that is reasonable for the services rendered.

8.

My said attorney shall have the full authority to obtain from any person or persons any documents, papers, instruments or other data in the possession of another that I own or have an interest or claim in and such person or persons having possession of same shall deliver to my said attorney the requested materials.

9.

I authorize my attorney in fact to repay to herself any amounts that she may have advanced to this point in time or any amounts that may be advanced in the future for professional, legal, medical or other services retained by my attorney in fact, though such may have been done before the execution by me of this document.

10.

I hereby grant this power of attorney to the said Deanna B. Thomas only during my lifetime; this power and authority terminating upon my death or the death of _____, whichever comes first. Further, this Power of Attorney may be revoked by me at any time in writing upon my giving written notice to my attorney in fact. In the event that a guardianship of person and/or property is filed by any person as against me, then, in that event, pursuant to OCGA 29-5-2(c)(1), I hereby nominate Deanna B. Thomas to serve as such a guardian of my person and/or conservator.

11.

Generally, I do hereby grant unto my said attorney in fact the full power and authority in and about the premises; and generally to do and to perform all and every act and acts, thing and things, device and devices in the law whatsoever needful and necessary to be done in and about the premises; and for me and in my name to do, execute and perform, as largely and amply, to all intents and purposes, as I might or could do if I were personally present; and an attorney, or attorneys under me for the purposes and purposes aforesaid to make and substitute, hereby ratifying and confirming all that my said attorney in fact or substitute shall lawfully do by virtue hereof.

12.

This Power-of-Attorney shall become effective, in whole or in part only if I lack sufficient understanding or capacity to make responsible decisions concerning my person and/or my property (or I am incapable of communicating such decisions) by reason of one or more of the following infirmities:

- Mental illness
- Advanced Age
- Mental disability
- Physical illness or disability

As declared either:

- a.) by a physician licensed to practice under Chapter 34 of Title 43 of the Official Code of Georgia Annotated (O.C.G.A.) or a psychologist licensed to practice under Chapter 39 of Title 43 of the O.C.G.A.;
- or
- b.) A Court of competent jurisdiction.

13.

This Power-of-Attorney shall terminate and be without effect in the event that a physician or psychologist, as defined in Paragraph 12 above, or a court of competent jurisdiction determines that the disability or incapacity which activated the Power has been removed.

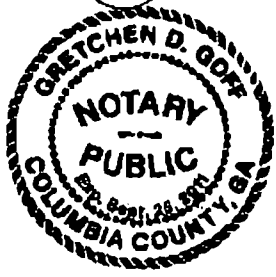
IN WITNESS WHEREOF, I have hereunto set my hand and seal IN TRIPLICATE,

this _____ day of _____, 2008

Deanna B. Thomas _____
 Witness

Sworn to and subscribed before me this 15th day of MAY 2008

Gretchen D. Goff
 NOTARY PUBLIC (SEAL)



SIGNATURE PAGE
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I So Move and Consent

Larry Brown
Larry Brown

Date: 11-9-15

Louis Levenson 11/17/15
Louis Levenson
Counsel for Larry Brown


SIGNATURE PAGE

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I So Move and Consent:


Deanna J. Brown Thomas

Date: 11/6/15


Louis Levenson
Counsel for Deanna J. Brown Thomas

SIGNATURE PAGE

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I So Move and Consent:

Jason Brown-Lewis
Jason Brown Lewis

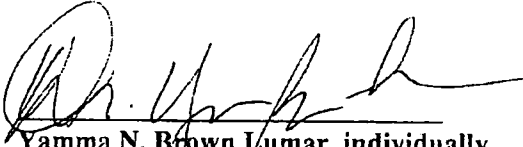
Date: 11-6-15

Lois Evenson
Lois Evenson
Counsel for Jason Brown Lewis

SIGNATURE PAGE

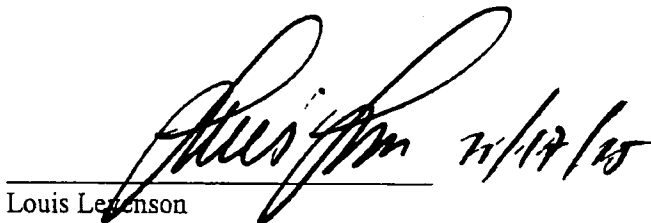
(5 of 7)

I So Move and Consent:



**Yamma N. Brown Lumar, individually
and on behalf of her minor children
Sydney Lumar and Carrington Lumar**

Date: 11/6/15



**Louis Legenson
Counsel for Yamma N. Brown Lumar,
individually and on behalf of her minor children,
Sydney Lumar and Carrington Lumar**

SIGNATURE PAGE

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I So Move and Consent:

**Russell L. Bauknight, as Personal Representative
and Special Administrator of the Estate of James
J. Brown, Jr., and Trustee and Special Trustee of the
Irrevocable Trust Agreement, u/a/d August 1, 2000**

Date: _____

**J. David Black
Counsel for Russell L. Bauknight, as Personal Representative
and Special Administrator of the Estate of James J. Brown, Jr.,
and Trustee and Special Trustee of the Irrevocable Trust
Agreement, u/a/d August 1, 2000**

SIGNATURE PAGE
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I So Move and Consent:

**David C. Sojourner, Jr., as Limited Special
Administrator of the Estate of James J. Brown, Jr.,
and as Limited Special Trustee of the Irrevocable
Trust Agreement, u/a/d August 1, 2000**

Date: _____

**John F. Beach
Counsel for David C. Sojourner, Jr., as Limited Special
Administrator of the Estate of James J. Brown, Jr., and
Limited Special Trustee of the Irrevocable Trust Agreement,
u/a/d August 1, 2000**