

EXHIBIT D

Consent Order to Dismiss Claims of Petitioner Tonya Brown a/k/a Sarah LaTonya Brown
Fegan With Prejudice

FILED 12-7-2015
Liz Anderson
D.C.C.P. & G.S.
Amita Kinoshita
Deputy Clerk

related claims or causes of action asserted by Petitioner 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]

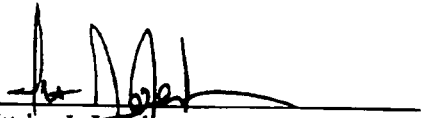
SIGNATURE PAGE

(1 of 3)

I So Move and Consent:


Tonya Brown, a/k/a Sarah LaTonya Brown Fegan

Date: 11/13/2015


Itriss J. Jenkins
Counsel for Tonya Brown, a/k/a Sarah LaTonya Brown Fegan

SIGNATURE PAGE


(1 of 3)

I So Move and Consent:

Tonya Brown, a/k/a Sarah LaTonya Brown Fegan

Date: _____

Ittriss J. Jenkins
Counsel for Tonya Brown, a/k/a Sarah LaTonya Brown Fegan



William J. Barr
Counsel for Tonya Brown, a/k/a Sarah LaTonya Brown Fegan

SIGNATURE PAGE
(2 of 3)

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
(3 of 3)

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**

STATE OF SOUTH CAROLINA)
)
COUNTY OF AIKEN)
)
)
)
)
IN RE:)
)
)
THE ESTATE OF JAMES BROWN)
A/K/A JAMES JOSEPH BROWN)
)
)

IN THE COURT OF COMMON PLEAS
FOR THE SECOND JUDICIAL CIRCUIT

CASE NO. 2008-CP-02-1647

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served on December 4, 2015, a copy of the following documents:

1. **Joint Motion to Authorize Settlement of Brown Children's Undue Influence Cases and to Dismiss Cases with Prejudice, Motion Information Sheet; and**
2. **this Certificate of Service**

by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows to:

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

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

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

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

12-7-15
Lisa Bodman
D.C.P. & G.S.
Christa Kneer
Deputy Clerk


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 Pettitt and Cherquarius Williams for
LaRhonda Pettitt*

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

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 Pettitt and Cherquarius Williams for
LaRhonda Pettitt*

Scott Keniley, Esq.
Keniley Kumar LLC
Two Ravinia Drive, Suite 500
Atlanta GA 30346
Attorney for Terry Brown and Forlando Brown

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 Pettitt and Cherquarius Williams for
LaRhonda Pettitt*


Linda B. Brewer, Paralegal

December 4, 2015
Columbia, South Carolina

STATE OF SOUTH CAROLINA

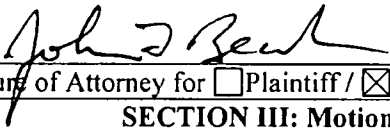
COUNTY OF AIKEN

IN RE:
THE ESTATE OF JAMES BROWN
A/K/A JAMES JOSEPH BROWN,

IN THE COURT OF COMMON PLEAS

CASE NO.
2008-CP-02-1647

MOTION AND ORDER INFORMATION
FORM AND COVER SHEET

Plaintiff's Attorney: Mary Frances G. Jowers, Bar No. Address: PO Box 11549, Columbia, SC 29211 phone: 803-734-3996 fax: e-mail: other:	Defendant's Attorney: John F. Beach, Bar No. 595 Address: 1501 Main St., 5 th Floor, Columbia, SC 29201 phone: 803-343-1269 fax: 803-799-8479 e-mail: john.beach@arlaw.com other:
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: Joint Motion to Authorize Settlement of Brown Children's Undue Influence Cases and to Dismiss with Prejudice Estimated Time Needed: 2 hours Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input type="checkbox"/> Plaintiff / <input checked="" type="checkbox"/> Defendant	
Date submitted: December 2, 2015	
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID - AMOUNT: \$25.00 <input type="checkbox"/> EXEMPT:	
(check reason) <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: <input type="checkbox"/> Other:	
JUDGE'S SECTION	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	JUDGE: _____ CODE: _____ Date: 12-7-15
CLERK'S VERIFICATION	
Collected by: _____ <input checked="" type="checkbox"/> MOTION FEE COLLECTED: CK # 400675 <input type="checkbox"/> CONTESTED - AMOUNT DUE: Vapt	Date Filed: _____ C.C.P. & G.S. Anita Kneesele Deputy Clerk