

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. 2016-001373

RECEIVED
AUG 19 2016
SC Court of Appeals

Russell L. Bauknight, in his capacity as Personal Representative of the Estate of James Brown and Trustee of the James Brown Irrevocable Trust Agreement u/a/d August 1, 2000, 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, Tonya Brown a/k/a Sarah Latonya Brown, 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,Respondents,

v.

Terry Brown and Darryl Brown of whom Terry Brown is the Appellant.

In Re: The Estate of James Brown a/k/a James Joseph Brown

RESPONDENT 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'S MOTION FOR AN EXTENSION OF TIME TO FILE INITIAL BRIEF

TO: THE HONORABLE CHIEF JUDGE AND THE ASSOCIATE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

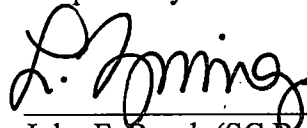
Appellant David C. Sojourner, Jr., Esquire, in his capacity as Limited Special Administrator of the Estate of James Brown, a/k/a James Joseph Brown, and Limited Special Trustee of the James Brown Irrevocable Trust, u/a/d August 1, 2000 ("Respondent"), by and through his undersigned counsel, hereby moves for an extension of time to file and serve the

Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal which is currently due on August 29, 2016.

Respondent seeks additional time to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal as counsel for Appellant has informed Respondent he has not received a copy of the transcript from the May 16, 2016 hearing on Appellant's Motion to Reconsider, Alter, and/or Amend the lower court's order authorizing settlement ("Order on Appeal"). The undersigned counsel has consulted with counsel for the Appellant who has consented to extend the deadline for Respondents to file their initial briefs and Designation of Matter to be Included in the Record on Appeal until the date thirty (30) days from when Appellant notifies this Court of his receipt of the May 16, 2016 transcript.

Accordingly, for reasons stated and in the interest of judicial economy, Respondent respectfully requests an order allowing Respondent to file Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal on or before thirty days from the date Appellant notifies this Court he has received the May 16, 2016 hearing transcript.

Respectfully submitted,



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

August _____, 2016.

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Russell L. Bauknight, in his capacity as Personal Representative of the Estate of James Brown and Trustee of the James Brown Irrevocable Trust Agreement u/a/d August 1, 2000, 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, Tonya Brown a/k/a Sarah Latonya Brown, 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, Respondents,

v.

Terry Brown and Darryl Brown of whom Terry Brown is the Appellant.

In Re: The Estate of James Brown a/k/a James Joseph Brown

PROOF OF SERVICE

The undersigned hereby certifies that she has served the foregoing Respondent 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's Motion for an Extension of Time to File Initial Brief by depositing a copy of same in the United States Mail, postage prepaid on August 19, 2016 and addressed as follows:

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Limited Special Administrator of the Estate of
James Brown and Limited Special Trustee of the
James Brown Irrevocable Trust, w/a/d August 1,
2000*

August 19, 2016

ADAMS AND REESE LLP

August 19, 2016

Attorneys at Law
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Louisiana
Mississippi
South Carolina
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Washington, DC

Via Hand Delivery

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

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Terry Brown v. Russell L. Bauknight, et al.
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A&R File No. 022853-000001

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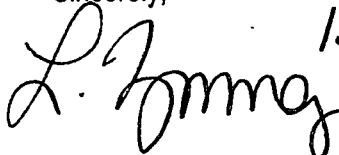
Dear Ms. Kitchings:

Enclosed for filing are an original and seven (7) copies of the Respondent's Motion for an Extension of Time to File Initial Brief in the above-referenced matter together with a Proof of Service. Please file the original and six copies and return the extra clocked-in copy with our courier. Our check in the amount of \$25.00 is enclosed to cover the filing fee.

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

Thank you for your assistance in this matter. Please contact me with any questions or concerns.

Sincerely,

 J.F.B.

John F. Beach

JFB/lbb

Enclosures

cc: David C. Sojourner
All parties of Record