

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. 2015-002417

RECEIVED
SEP 06 2016
SC Court of Appeals

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.

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

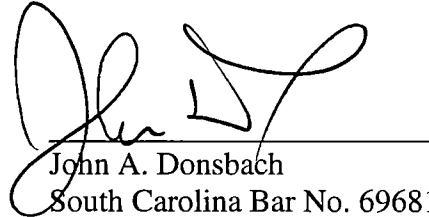
Appellant proposes the following be included in the Record on Appeal:

1. Final Order granting Appellee partial summary judgment entered January 23, 2015;
2. Final Order denying Motions to Alter, Amend or Reconsider entered October 26, 2015;

3. Joint Stipulation of Facts with Exhibits 1 through 19;
4. March 31 Hearing Transcript, pp. 54-62;
5. Affidavit of Scott Keniley dated October 2, 2014 with attached Exhibit of Marriage License Application;
6. Affidavit of David Bell dated September 30, 2014.

I certify that this designation contains no matter which is irrelevant to this appeal.

September 2, 2016.



John A. Donsbach
South Carolina Bar No. 69681
Donsbach & King, LLC
P.O. Box 212139
Martinez, Georgia 30917
Telephone: (706) 650-8750
Facsimile: (706) 651-1399
Email: jdonsbach@donsbachking.com
Attorney for Appellant Terry Brown

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. 2015-002417

RECEIVED
SEP 06 2016
SC Court of Appeals

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.

PROOF OF SERVICE

The undersigned hereby certifies that on September 2, 2016, he has caused a copy of the DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL to be served on all counsel in this matter by depositing a copy of it in the United States Mail, postage prepaid, addressed to the following:

Robert N. Rosen, Esq.
Corey T. L. Smith, Esq.
Erin C. Casey, Esq.
Rosen Law Firm, LLC
18 Broad Street, Suite 201
Charleston, SC 29401
Attorney for Tommie Rae Brown

John F. Beach, Esq.
Lyndey Ritz Zwingelberg, Esq.
Adams and Reese LLP
1501 Main Street, Fifth Floor
Columbia, SC 29201
Attorney for David C. Sojourner, Jr.,
Limited Special Administrator and
Limited Special Trustee

Louis Levenson, Esq.
Levenson & Associates
125 Broad Street, SW
Atlanta, GA 30303
Attorney for Deanna Brown Thomas,
Yamma Brown, Venisha Brown
and Larry Brown

Robert C. Byrd, Esq.
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
Attorney for Deanna Brown-Thomas,
Dr. Yamma Brown, and Venisha Brown

Amber B. Carter, Esq.
Parker, Poe, Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, SC 29201
Attorney for Deanna Brown-Thomas,
Dr. Yamma Brown, and Venisha Brown

Arnold S. Goodstein, Esq.
208 Sumter Avenue
Summerville, SC 29484-2350
Attorney for Tommie Rae Brown

Matthew D. Bodman, Esq.
Matt Bodman, P.A.
1500 Calhoun Street
Columbia, SC 29201
Attorney for Larry Brown, Daryl Brown
and Michael Deon Brown

David B. Bell, Esq.
Law Offices of David B. Bell
619 Greene Street
Augusta, GA 30903-1011
Attorney for Daryl Brown, Michael Deon Brown
and Lisa Sims

William J. Barr, Esq.
108 N. Academy St.
Kingstree, SC 29556
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

Vera Gilford, Esq.
P.O. Box 12553
Miami, FL 33101
Attorney for Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

J. David Black, Esq.
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, SC 29201
Attorney for Russell Bauknight

C. Havird Jones, Jr., Esq.
Office of the SC Attorney General
P.O. Box 11549
Columbia, SC 29211-1549

James Mixon Griffin, Esq.
Griffin & Davis Law Firm
1527 Blanding Street
Columbia, SC 29201

S. Alan Medlin, Esq.
1713 Phelps Street
Columbia, SC 29205
Attorney for Tommie Rae Brown

T. Heyward Carter, Jr., Esq.
Evans, Carter, Kumes & Bennett, PA
115 Church Street
P.O. Box 369
Charleston, SC 29401
Attorney for Tommie Rae Brown

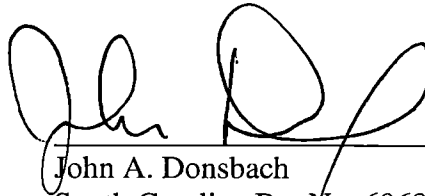
David L. Michel, Esq.
15 State Street
Charleston, SC 29401
Attorney for Tommie Rae Brown

Itriss J. Jenkins, Esq.
Itriss J. Jenkins, LLC
215 E. Bay St., Suite 203
Charleston, SC 29401
Attorney for Respondents Tonya Brown a/k/a
Sarah LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cheraquarius Williams for
LaRhonda Petitt

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

Russell L. Bauknight
Estate Trustee and Personal Representative
Bauknight, Pietras & Stormer, P.A.
P.O. Box 1330
Columbia, SC 29202

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

A handwritten signature in black ink, appearing to read "John A. Donsbach", is written over a horizontal line. The signature is fluid and cursive.

John A. Donsbach
South Carolina Bar No. 69681
Donsbach & King, LLC
P.O. Box 212139
Martinez, Georgia 30917
Telephone: (706) 650-8750
Facsimile: (706) 651-1399
Email: jdonsbach@donsbachking.com
Attorney for Appellant Terry Brown

DONSBACH & KING, LLC

ATTORNEYS AT LAW

John A. Donsbach (AL, GA, SC)
J. Brian King (DC, GA, SC)
Judith M. Becker (GA)

Street Address:

504 Blackburn Drive
Augusta, GA 30907

Mailing Address:

P.O. Box 212139
Martinez, GA 30917-2139

Of Counsel:

David K. Anderson, P.C. (GA)

www.donsbachking.com

Telephone (706) 650-8750

September 2, 2016

RECEIVED

SEP 06 2016

SC Court of Appeals

VIA UPS OVERNIGHT

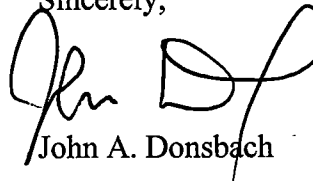
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Estate of James Brown a/k/a James Joseph Brown
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 one (1) copy of Initial Brief of Appellant and Proof of Service and Designation of Matter to be Included in the Record on Appeal and Proof of Service in the above-referenced case. Please file the original and return a time-stamped 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: William J. Barr, Esq. (w/ encls.)
John F. Beach, Esq. and Lyndey Ritz Zwingelberg, Esq. (w/encls.)
David B. Bell, Esq. and (w/ encls.)
J. David Black, Esq. (w/encls.)
Matthew D. Bodman, Esq. (w/ encls.)
Robert C. Byrd, Esq. (w/encls.)
Amber B. Carter, Esq. (w/encls.)
T. Heyward Carter, Jr., Esq.
Vera Gilford, Esq. (w/ encls.)
Arnold S. Goodstein, Esq. (w/ encls.)
James Mixon Griffin, Esq. (w/encls.)
Itriss J. Jenkins, Esq. (w/ encls.)
C. Havird Jones, Esq. (w/encls.)
Louis Levenson, Esq. (w/ encls.)
S. Alan Medlin, Esq. (w/ encls.)
David L. Michel, Esq.
Robert N. Rosen, Esq., Corey T. L. Smith, Esq., and Erin S. Casey, Esq. (w/ encls.)
A. Peter Shahid, Jr., Esq. (w/ encls.)
Steven M. Slotchiver, Esq. (w/ encls.)

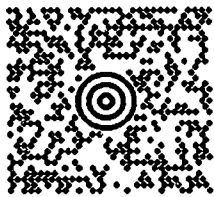
JOHN A. DONSBACH
706-650-8750
DONSBACH & KING, LLC
504 BLACKBURN DRIVE
MARTINEZ GA 30907

2.0 LBS LTR

1 OF 1

SHIP TO:

THE HON. JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA SC 29201-3769



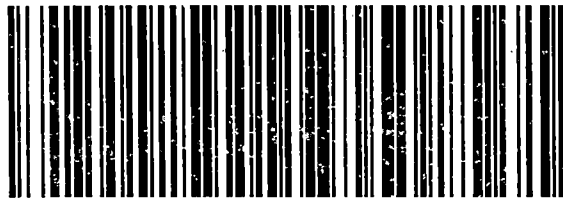
SC 291 9-01



UPS 2ND DAY AIR

2

TRACKING #: 1Z 984 W9V 35 9356 0647



BILLING: P/P
SIGNATURE REQUIRED

Reference#1: 2497/1

RECEIVED  TM

US 18.5.39. WNTNVS0 78.OA 07/2016

SEP 06 2016

SC Court of Appeals