

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 08 2016  
SC Court of Appeals

Tommie Rae Brown, .....Respondent,

v.

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, 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 Daryl Brown proposes that the following is included in the Record on Appeal:

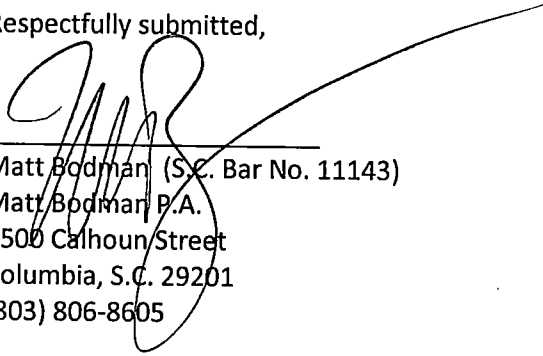
1. Final Order of partial summary judgment in favor of Respondent entered January 23, 2015;
2. Final Order denying Motions to Alter, Amend or Reconsider entered October 26,

2015;

3. Joint Stipulation of Facts with Exhibits.

I certify that the designation does not include any matter which is irrelevant to this appeal.

Respectfully submitted,



---

Matt Bodman (S.C. Bar No. 11143)  
Matt Bodman P.A.  
1500 Calhoun Street  
Columbia, S.C. 29201  
(803) 806-8605

David B. Bell (*admitted pro hac vice*)  
P.O. Box 1011  
Augusta, GA 30903  
(706) 724-1882  
*Attorneys for Appellant*

*September 8, 2016*

IN 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 08 2016

SC Court of Appeals

Tommie Rae Brown,.....Respondent

v.

David C. Sojourner, 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 he has served Designation of Matter to be Included in the  
Record on Appeal by depositing a copy of same in the United States Mail, postage prepaid on Thursday  
September 8, 2016 addressed as follows

Robert N. Rosen, Esq.  
Erin C. Casey, Esq.  
Rosen Law Firm LLC  
18 Broad Street, Suite 201  
Charleston, S.C. 29401  
*Attorneys for Tommie Rae Brown*

S. Alan Medlin  
1713 Phelps Street  
Columbia, S.C. 29205  
*Attorney for Tommie Rae Brown*

Amber B. Carter, Esq.  
Robert C. Byrd, Esq.  
Parker Pose Adams & Bernstein LLP  
1201 Main Street, Suite 1450  
Columbia, SC 29201  
Attorney for Deanna Brown Thomas,  
Yamma Brown, Venisha Brown and  
Larry Brown

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

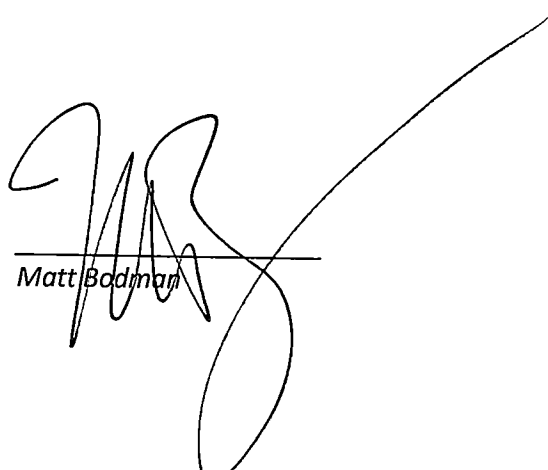
William Joseph Barr, Esq.  
Barr Law LLC  
108 Academy Street  
Kingstree, S.C. 29556-3422  
Attorney for Tomya Brown a/k/a  
Sarah LaTonya Brown-Fegan, Jeanette  
Mitchell and Ciara Petit and Cherquarius  
Williams for LaRhonda Petit

Vera Gilford, Esq.  
Post Office Box 12553  
Miami, FL 33101  
Attorney for Tonya Brown a/k/a Sarah  
LaTonya Brown Fegan, Jeanette Mitchell,  
And Ciara Petit and Cherquarius Williams  
For LaRhonda Petit

John F. Beach  
Adams and Reese LLP  
1501 Main Street. 5<sup>th</sup> Floor  
Columbia, S.C. 29201  
Attorney for LSA and LST

Itriss Jenkins, Esq.  
Itriss J. Jenkins LLC  
215 E. Bay Street, Suite 203  
Charleston, S.C. 29401  
Attorney for Tonya Brown a/k/a Sarah  
LaTonya Brown-Fegan, Jeanette Mitchell,  
and Ciara Petit and Cherquarius Williams  
for LaRhonda Petit

A. Peter Shahid Jr., Esq.  
Shahid Law Office  
89 Broad Street  
Charleston, S.C. 29401  
Attorney for Guardian Ad Litem  
Stephen M. Slotchiver, for James Brown II

  
Matt Bodman

September 8, 2016

# Matt Bodman, P.A.

*Attorney at Law*

1500 Calhoun Street  
Columbia, South Carolina 29201



Telephone (803) 806-8605 • Facsimile (803) 758-6087  
matt@mattbodmanlaw.com • www.mattbodmanlaw.com

Thursday, September 8, 2015

VIA HAND DELIVERY

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

**RECEIVED**  
SEP 08 2016  
SC Court of Appeals

RE: Estate of James Brown A/K/A James Joseph Brown  
Tommie Rae Brown v. David C. Sojourner et al  
Appellate Case No. 2015-002417  
Civil Case No. 2013-CP-02-02849, 2013-CP-02-02850

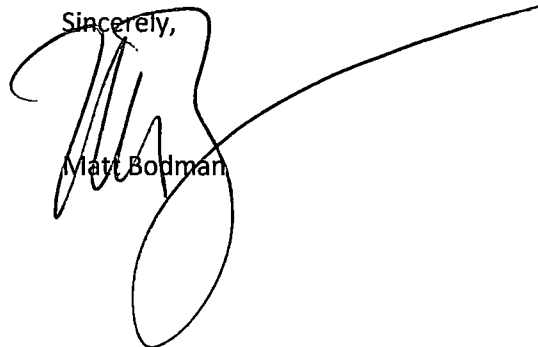
Dear Ms. Kitchings:

Enclosed is an original and a copy of the Initial Brief of Appellant and Proof of Service and Designation of Matter to be Included in the Record on Appeal and Proof of Service.

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

Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Matt Bodman

Cc: All parties of record