

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.

INITIAL BRIEF OF APPELLANT MICHAEL DEON BROWN

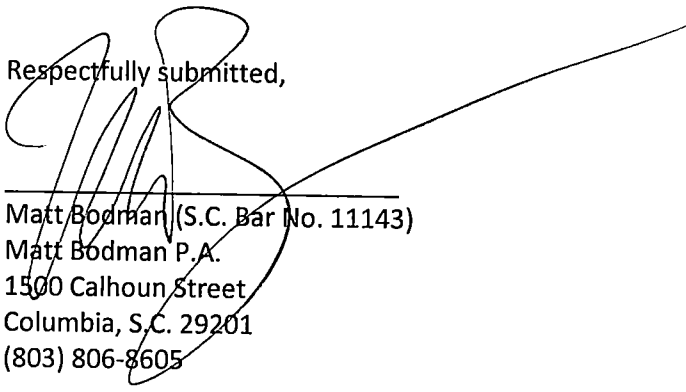
Michael Deon Brown, by and through his undersigned counsel, does not believe that he needs to file an amended initial brief but hereby does so out of an abundance of caution. Michael Deon Brown adopts all of the initial brief pursuant to SCACR 208(b)(6) previously filed by Appellant David C.

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 Estate of the James Brown Irrevokable Trust.

In the event that this Court does not allow Appellant Michael Deon Brown to adopt in full Appellant David C. Sojourner's initial brief, then Appellant Michael Deon Brown in the alternative adopts in full all of the initial brief dated September 2, 2016 filed by Appellant Terry Brown pursuant to SCASCR 208(b)(6).

Respectfully submitted,



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September __ 2016

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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 Initial Brief of Appellant Michael Deon
Brown by depositing a copy of same in the United States Mail, postage prepaid on Thursday September
8, 2016 addressed as follows

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September 8, 2016

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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

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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

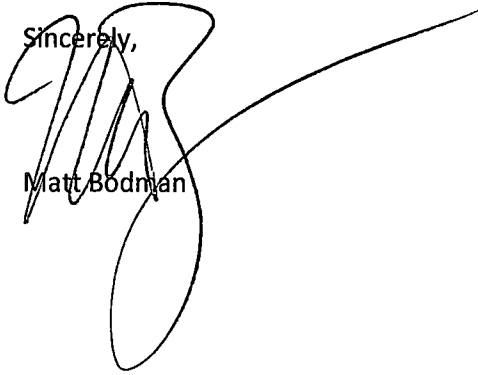
Dear Ms. Kitchings:

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