

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

RECEIVED
OCT 10 2015
SC Court of Appeals

Case Nos. 2013-CP-02-02849, 2013-CP-02-02850

Appellate Case No. 2015-002417

Tommie Rae BrownRespondent,

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.

RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL

Respondent Tommie Rae Brown proposed that the following is included in the Record on Appeal:

1. Order Granting Tommie Rae Brown's Motion for Summary Judgment and Denying Limited Special Administrator's Motion for Summary Judgment, filed January 13, 2015;

2. Order Denying Motions to Alter, Amend, or Reconsider, filed October 26, 2015;
3. Joint Stipulation of Facts, filed September 5, 2014;
4. Tommie Rae Brown's Motion for Summary Judgment, filed April 28, 2014;
5. Memorandum in Support of Tommie Rae Brown's Motion for Partial Summary Judgment, filed September 24, 2014, cover page and pp. 32-35;
6. Joint Motion to Authorize Settlement of Brown's Children Undue Influence Cases, filed December 7, 2015, with Settlement Agreement and Release, dated November 17, 2015 attached;
7. Amended Affidavit of Tommie Rae Brown in Support of Her Motion for Summary Judgment, dated November 15, 2007, filed December 26, 2007;
8. Original Settlement Agreement of August 10, 2008;
9. Addendum to Private Agreement of August 10, 2008 to Include Settlement Agreement with Terry Brown Creating Restated and Amended Private Agreement, filed March 26, 2009;
10. Order Approving Settlement Agreement, filed May 26, 2009;
11. Final Brief of Respondents in *Wilson v. Dallas*, filed May 2, 2011, cover page, table of contents, and pp. 30-31;
12. Supreme Court Oral Argument Audio Recording for *Wilson v. Dallas* and/or transcript of the same at 42:40 as quoted in Respondent's brief at p. 65 fn. 45;
13. Tommie Rae Brown's Return in Opposition to Respondents' Motions to Alter, Amend or Reconsider, filed July 6, 2015.

The undersigned hereby certify that this designation does not include any matter which is irrelevant to this appeal.

Respectfully submitted,

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TOMMIE RAE BROWN

Charleston, SC
September 30, 2016

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Tommie Rae Brown Respondent,

v.

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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 a copy of the foregoing Designation of Matter to Be Included in the Record on Appeal of Respondent Tommie Rae Brown has been served on all counsel of record by depositing a copy of same in the United States Mail, postage prepaid on September 30, 2016, and addressed as follows:

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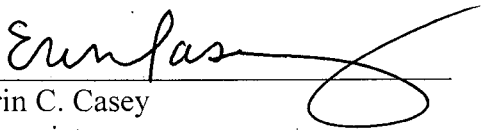
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September 30, 2016

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RECEIVED
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SC Court of Appeals

By US Mail

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

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

Dear Ms. Kitchings:

Enclosed for filing is an original and one copy of the **Initial Brief of Respondent Tommie Rae Brown** and **Designation of Matter to Be Included in the Record on Appeal** in the above-referenced matter together with a **Proof of Service**. Please file the original and return the clocked-in copy in the enclosed pre-addressed, pre-stamped envelope.

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

Thank you for your assistance, and please feel free to contact our office if you have any questions.

Sincerely,



Robert N. Rosen

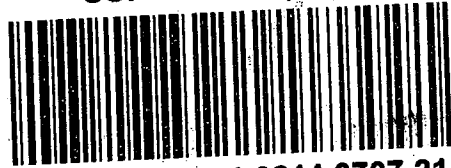
RNR/ecc
Enclosures

cc: All Counsel of Record (w/ enclosures)
Tommie Rae Brown (via email)

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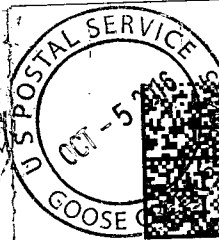
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The Honorable Jenny Abbott Kitchings
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