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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

RECEIVED

OCT 10 2016

Doyet A. Early III, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-002417

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,

of whom 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, is the.....Appellant

APPELLANT DAVID C. SOJOURNER, JR.'S MOTION  
FOR AN EXTENSION OF TIME TO FILE REPLY 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 ("Appellant"), by and through his undersigned counsel, hereby moves for a thirty (30) day extension of time beyond the normal ten (10) day time limit in Rule 208(a)(3), SCACR, to file and serve the LSA's Reply

Brief. The Appellant's Reply Brief is currently due on October 10, 2016.

Appellant seeks additional time to file his Reply Brief based on an Order of this Court, filed August 19, 2016, granting Respondent Tommie Rae Brown's request to exceed the page limit to seventy-five pages. Due to the length of Respondent's brief and complexity of the legal issues involved in this appeal, Appellant needs additional time to prepare his reply brief. In addition, as the Court is aware, the courts in many parts of the State, as well as numerous law firms and other businesses, are closed from Wednesday, October 5 through Tuesday, October 11, 2016, as a result of an impending hurricane on the east coast which is forecasted to affect many geographic regions in South Carolina.

Counsel for Appellant has consulted with counsel for Respondent, Tommie Rae Brown, and Counsel for Respondent consents to this motion.

Accordingly, for reasons stated and in the interest of judicial economy, Appellant respectfully requests thirty (30) additional days from October 10, 2016 to file his Reply Brief. Appellant's Reply Brief, as extended, would be due November 9, 2016.

Respectfully submitted,



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Jr., 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*

October 5, 2016.

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

Appellate Case No. 2015-002417

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SC Court of Appeals

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 she has served the foregoing Appellant David C. Sojourner, Jr.'s Motion for Extension of Time to File Reply Brief by depositing a copy of same in the United States Mail, postage prepaid on October 5, 2016 and addressed as follows:

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Trustee of the James Brown Irrevocable  
Trust, u/a/d August 1, 2000*

October 5, 2016

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

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OCT 10 2016

SC Court of Appeals

In Re: The Estate of James Brown a/k/a James Joseph Brown  
Tommie Rae Brown v. David C. Sojourner, Jr., et al.  
Appellate Case No. 2015-002417  
A&R File No. 022853-000001

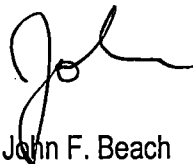
Dear Ms. Kitchings:

Enclosed for filing are an original and seven copies of the Appellant David C. Sojourner, Jr.'s Motion for an Extension of Time to File Reply Brief in the above-referenced matter together with a Proof of Service. Please file the original and seven copies and return the extra clocked-in copy with our courier. Our check in the amount of \$25.00 is enclosed to cover the motion 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,



John F. Beach

JFB/lbb

Enclosures

cc: David C. Sojourner  
All parties of Record



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ADAMS AND REESE LLP

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The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11623  
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SC Court of Appeals

