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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
OCT 10 2016
SC Court of Appeals

In Re: The Estate of James Brown a/k/a James Joseph Brown,

Tommie Rae Brown..... Petitioner below,

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.

**APPELLANTS' MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF**

Appellants Deanna Brown-Thomas, Dr. Yamma Brown and Venisha Brown
("Appellants") hereby move the Court 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 their Reply Brief. The
Appellants are informed and believe their Reply Brief is currently due on October 10, 2016.

Because of the length of Respondent's brief and the complexity of the legal issues
involved, Appellants require additional time to prepare their Reply Brief. In addition, the

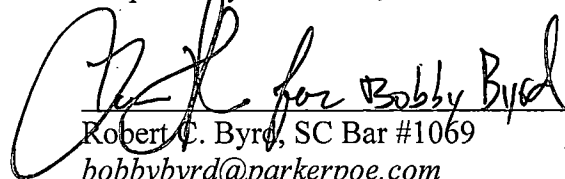
undersigned counsel for Appellants just received a copy of Respondent's Initial Brief today, October 10, 2016, because the Brief was forwarded to Parker Poe's Columbia office and re-routed to its Charleston office, which has been closed since last Wednesday, October 5, 2016, due to Hurricane Matthew.

Appellants respectfully request that the deadline for filing their Reply Brief be extended for thirty (30) days until Wednesday, November 9, 2016. The undersigned counsel for Appellants has consulted with counsel for the Respondent, who has kindly consented to this Motion for Extension.

The undersigned counsel for Appellants further requests that the Court and all counsel of record note that Amber Carter is no longer with Parker Poe and that all further communications to Appellants be sent to:

Robert C. Byrd
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Charleston, SC 29401

Respectfully submitted,



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October 10, 2016

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Larry Brown, Terry Brown and Daryl Brown Respondents below,

Of whom David C. Sojourner, Jr., in his capacity as
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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 October 10, 2016 s/he has caused a copy of Appellants' Motion for Extension of Time to File Reply Brief to be served upon all parties of record by mailing a copy of Appellants' Motion for Extension of Time to File Reply Brief addressed as follows:

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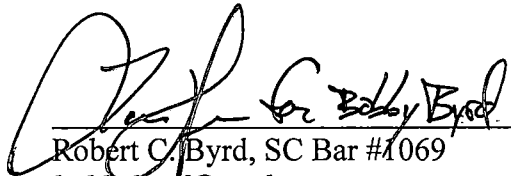
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October 10, 2016

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VIA HAND DELIVERY

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

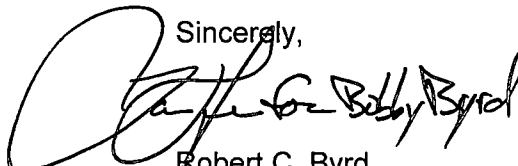
**Re: In Re: The Estate of James Brown a/k/a James Joseph Brown, Tommie Rae Brown v. David C. Sojourner, Jr., et al.
Appellate Case No. 2015-002417**

Dear Ms. Kitchings:

Enclosed for filing please find an original and seven copies of *Appellants' Motion for Extension of Time to File Reply Brief* along with a Proof of Service in the above-referenced appeal. Please return a filed-stamped copy of the motion with our courier.

By copy of this letter, we are serving all parties of record with a copy of *Appellants' Motion for Extension of Time to File Reply Brief*. We also notify all counsel of record that Amber T. Carter is no longer with Parker Poe and request that all further communications to Appellants Deanna Brown-Thomas, Dr. Yamma Brown and Venisha Brown be sent to Robert C. Byrd, Parker Poe Adams & Bernstein LLP, 200 Meeting Street, Suite 301, Charleston, SC 29401.

Should you have any questions regarding this matter, please do not hesitate to contact me. With kindest regards, I am

Sincerely,

Robert C. Byrd

Enclosures

cc: (please see following page)

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M. Jean Lee, Esq.
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