

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 19 2016
SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2016-001373

Russell L. Bauknicht, in his capacity as Personal Representative of the Estate of James Brown and Trustee of the James Brown Irrevocable Trust Agreement u/a/d August 1, 2000, 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, Tonya Brown a/k/a Sarah LaTonya Brown, Vanisha Brown, Larry Brown, Deanna J. Brown Thomas, Jason Brown Lewis and Yamma N. Brown Lumar, individually and on behalf of her minor children, Sydney Lumar and Carrington Lumar.....Respondents,

v.

Terry Brown and Darryl Brown of whom Terry Brown is the Appellant.

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

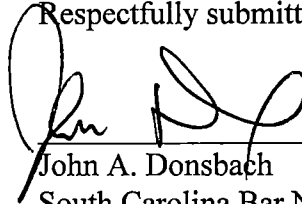
MOTION FOR EXTENSION TO FILE AND SERVE REPLY BRIEF

Appellant Terry Brown hereby moves the Court for a thirty (30) day extension of time to file his reply brief and additional Designation of Matters to be Included in Record beyond the ten (10) day limit in Rule 208(a)(3), SCACR. Appellant believes the Reply Brief would be due on Oct 24, 2016.

The length of Respondent's initial brief, number of issues to be addressed, and Appellant's counsel's current work load when coupled with the fact that Appellant received the Respondent's brief today, October 18, 2016, creates the need for Appellant to be granted additional time to file a Reply Brief. Appellant respectfully requests that the deadline for filing his Reply Brief and additional Designation of Matters to be Included in the Record be extended for thirty (30) days until Wednesday, November 23, 2016. Appellant's counsel has consulted with counsel for Respondent, who has graciously consented to this Motion for Extension.

October 18, 2016.

Respectfully submitted,



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v.

Terry Brown and Darryl Brown of whom Terry Brown is the Appellant.

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

PROOF OF SERVICE

The undersigned hereby certifies that on October 18, 2016, he has caused a copy of the Motion for Extension to File and Serve Initial Reply Brief, additional Designation of Matters to be Included in the Record on Appeal, and Proof of Service addressed as follows:

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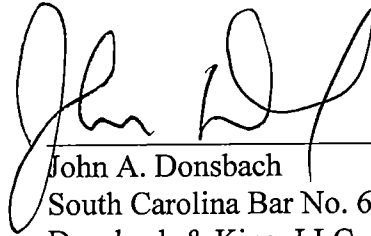
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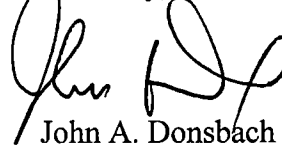
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *In Re: Estate of James Brown a/k/a James Joseph Brown*
Appellate Case No. 2016-001373
Civil Action No. 2008-CP-02-1647
C/M No.: 2497/1

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Motion for Extension to File and Serve Reply Brief in the above-referenced case. Also enclosed please find our firm's check in the amount of \$25 for the filing fee. Please file the original and six copies and return one copy to me in the enclosed self-addressed, stamped envelope. If you have any questions, please feel free to contact me. Thank you.

Sincerely,



John A. Donsbach

JAD/djg

Enclosures

cc: William J. Barr, Esq. (w/ encls.)
John F. Beach, Esq. and Lyndey Ritz Zwingelberg, Esq. (w/encls.)
David B. Bell, Esq. and (w/ encls.)
J. David Black, Esq. (w/encls.)
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A. Peter Shahid, Jr., Esq. (w/ encls.)
Steven M. Slotchiver, Esq. (w/ encls.)

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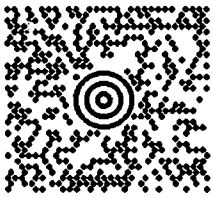
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1 OF 1

SHIP TO:

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SOUTH CAROLINA COURT OF APPEALS
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COLUMBIA SC 29201-3769



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