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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

**RECEIVED**

NOV 28 2016

SC Court of Appeals

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

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, Deana 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.

RESPONDENT'S MOTION FOR AN EXTENSION OF TIME TO FILE AND SERVE  
RETURNS TO APPELLANT DAVID C. SOJOURNER, JR.'S MOTIONS

TO: THE HONORABLE CHIEF JUDGE AND THE ASSOCIATE JUDGES OF THE  
SOUTH CAROLINA COURT OF APPEALS:

Respondent Tommie Rae Brown, by and through her undersigned counsel, hereby moves for a twenty (20) day extension of time beyond the normal ten (10) day time limit in Rule 240(e), SCACR, to file and serve the Respondent's Returns to Appellant David C. Sojourner, Jr.'s Motion to Exclude Irrelevant Documents from Record on Appeal and Appellant David C. Sojourner, Jr.'s Motion to Strike Irrelevant and Prejudicial

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Statements from Initial Brief of Tommie Rae Brown.

Respondent seeks additional time to file her Returns based on the significance of the legal issues involved and the complexity of the appeal. Counsel for Respondent has consulted with counsel for Appellant, David C. Sojourner, Jr., and Counsel for Appellant consents to this motion.

Accordingly, for reasons stated and in the interest of judicial economy, Respondent respectfully requests twenty (20) additional days to file her Returns to Motion to Exclude Irrelevant Documents from Record and Motion to Strike Irrelevant and Prejudicial Statements from Initial Brief.

Respectfully submitted,

ROSEN LAW FIRM, LLC



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ATTORNEYS FOR RESPONDENT  
TOMMIE RAE BROWN

Charleston, SC  
November 21, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Court of Common Pleas

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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.

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PROOF OF SERVICE

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The undersigned hereby certifies she has served the foregoing Respondent Tommie Rae Brown's Motion for an Extension of Time to File and Serve Returns to Appellant David C. Sojourner, Jr.'s Motion to Exclude Irrelevant Documents from Record on Appeal and Motion to Strike Irrelevant and Prejudicial Statements from Initial Brief of Respondent, by depositing a copy of the same in the United States Mail, postage prepaid on November 21, 2016 and addressed as follows:

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November 21, 2016

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Certified Family Court Arbitrator

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SC Court of Appeals

**By U.S. 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 please find an original and seven (7) copies of Respondent Tommie Rae Brown's **Motion for an Extension of Time to File and Serve Returns to Appellant David C. Sojourner, Jr.'s Motions** and the accompanying **Proof of Service**. Please file the original and six copies and return the extra clocked-in copy of the Motion and Proof of Service in the enclosed pre-addressed, pre-stamped envelope. Our check in the amount of \$25.00 is enclosed to cover the filing fee.

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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SC Court of Appeals

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