

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

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

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DEC 14 2016
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, 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 SECOND 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 an additional thirty (30) day extension of time beyond first extension deadline of December 21, 2016 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

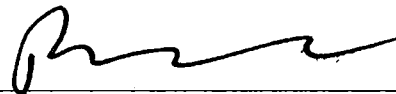
Appellant David C. Sojourner, Jr.'s Motion to Strike Irrelevant and Prejudicial Statements from Initial Brief of Tommie Rae Brown.

Respondent seeks additional time to file her Returns based on the significance of the legal issues involved, the complexity of the appeal, and the upcoming holidays. Accordingly, for reasons stated and in the interest of judicial economy, Respondent respectfully requests an additional thirty (30) to file her Returns to Motion to Exclude Irrelevant Documents from Record and Motion to Strike Irrelevant and Prejudicial Statements from Initial Brief. Based upon this requested second extension, Respondent's new deadline is January 20, 2017.

Counsel for Respondent has consulted with counsel for Appellant, David C. Sojourner, Jr., and Counsel for Appellant consents to this motion.

Respectfully submitted,

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ATTORNEYS FOR RESPONDENT
TOMMIE RAE BROWN

Charleston, South Carolina
December 9, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Court of Common Pleas

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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.

PROOF OF SERVICE

The undersigned hereby certifies she has served the foregoing Respondent Tommie Rae Brown's Second 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 December 9, 2016 and addressed as follows:

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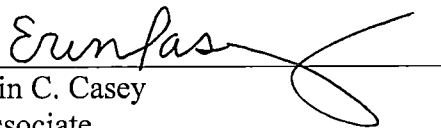
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PHONE (843) 377-1700

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December 9, 2016

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

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SC Court of Appeals

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

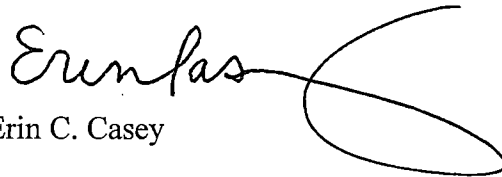
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent Tommie Rae Brown's **Second 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,



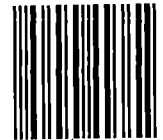
Erin C. Casey

Enclosures

cc: All Counsel of Record (w/ enclosures)

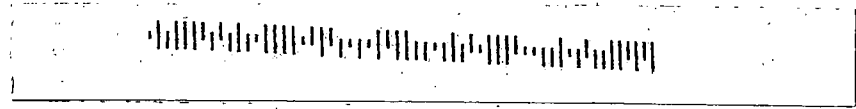


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