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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

RECEIVED

Doyet A. Early III, Circuit Court Judge

MAR 13 2017

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 theAppellant.

RESPONDENT'S MOTION FOR AN EXTENSION OF TIME TO FILE AND SERVE
AMENDED INITIAL BRIEF AND AMENDED DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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 extension of time to file and serve the Respondent's Amended Initial Brief
and Amended Designation of Matter to Be Included in the Record on Appeal. Pursuant

to this Court's Order filed February 8, 2017, Respondent's Amended Brief and Amended Designation are due on March 10, 2017.

In light of Joint Motion to Stay Appeal Pending Consummation of Settlement filed on March 8, 2017 by Appellant 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 ("LSA"), and Respondent, and in accordance with the settlement agreement between the LSA and Respondent accompanying the Joint Motion to Stay Pending Consummation of Settlement, Respondent seeks a stay of the March 10, 2017 deadline until such time as (1) the lower court issues a final order on their joint motion to dismiss before the lower court and (2) the LSA withdraws from the appeal.

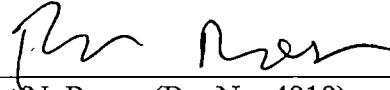
The withdrawal of the LSA affects the legal issues in the case and greatly affects the brief of Respondent which at present addresses issues raised by the LSA and argues the appeal as if the LSA is the chief appellant. Further, because of the significance of the legal issues involved, the complexity of the appeal, and the recent settlement agreement, Respondent respectfully requests an additional thirty (30) days after (1) the lower court issues a final order on their joint motion to dismiss before the lower court and (2) the LSA withdraws from the appeal

The motion is simply a request to extend the time to file the Respondent's brief until a later date. In the event this Court does not grant this Motion, Respondent has filed the current version of Respondent's Amended Initial Brief and Amended Designation of Matter to Be Included in the Record on Appeal to ensure, if necessary, compliance with the existing March 10, 2017, deadline for filing.

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
March 9, 2017

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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Tommie Rae BrownRespondent,

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 Motion for an Extension of Time to File and Serve Amended Initial Brief and Amended Designation of Matter to be Included in the Record on Appeal, by depositing a copy of the same in the United States Mail, postage prepaid on March 9th, 2017 and addressed as follows:

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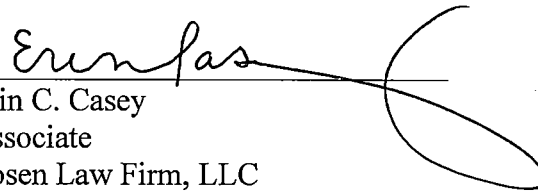
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FAX (843) 377-1709

March 9, 2017

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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MAR 13 2017

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 **Motion for an Extension of Time to File and Serve the Amended Initial Brief and Amended Designation of Matter to be Included in the Record on Appeal** 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)

J

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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