

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

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

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Appellate Case No. 2015-002417

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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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RESPONDENT'S AMENDED DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Respondent Tommie Rae Brown proposed that the following is included in the Record on Appeal:

1. Order Granting Tommie Rae Brown's Motion for Summary Judgment and Denying Limited Special Administrator's Motion for Summary Judgment, filed January 13, 2015;

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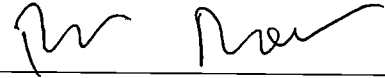
SC Court of Appeals

2. Order Denying Motions to Alter, Amend, or Reconsider, filed October 26, 2015;
3. Joint Stipulation of Facts, filed September 5, 2014;
4. Tommie Rae Brown's Motion for Summary Judgment, filed April 28, 2014;
5. Memorandum in Support of Tommie Rae Brown's Motion for Partial Summary Judgment, filed September 24, 2014, cover page and pp. 32-35;
6. Amended Affidavit of Tommie Rae Brown in Support of Her Motion for Summary Judgment, dated November 15, 2007, filed December 26, 2007;
7. Original Settlement Agreement of August 10, 2008;
8. Addendum to Private Agreement of August 10, 2008 to Include Settlement Agreement with Terry Brown Creating Restated and Amended Private Agreement, filed March 26, 2009;
9. Order Approving Settlement Agreement, filed May 26, 2009;
10. Final Brief of Respondents in *Wilson v. Dallas*, filed May 2, 2011, cover page, table of contents, and pp. 30-31;
11. Supreme Court Oral Argument Audio Recording for *Wilson v. Dallas* and/or transcript of the same at 42:40 as quoted in Respondent's brief at p. 65 fn. 45;
12. Tommie Rae Brown's Return in Opposition to Respondents' Motions to Alter, Amend or Reconsider, filed July 6, 2015.

The undersigned hereby certify that this designation does not include any matter which is irrelevant to this appeal.

Respectfully submitted,

ROSEN LAW FIRM, LLC



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Charleston, SC  
March 9, 2017

THE STATE OF SOUTH CAROLINA  
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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 that a copy of the foregoing Amended Designation of Matter to Be Included in the Record on Appeal of Respondent Tommie Rae Brown has been served on all counsel of record by depositing a copy of same in the United States Mail, postage prepaid on March 9<sup>th</sup>, 2017, and addressed as follows:

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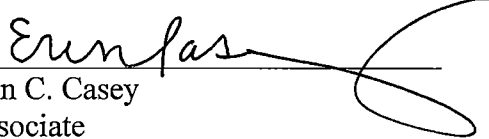
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March 9, 2017

***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

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 for filing is an original and one copy of the **Amended Initial Brief of Respondent Tommie Rae Brown** and **Amended Designation of Matter to Be Included in the Record on Appeal** in the above-referenced matter together with the **Proofs of Service**. Please file the original and return the clocked-in copy in the enclosed pre-addressed, pre-stamped envelope.

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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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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