

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

Trial Court Case Nos. 2013-CP-02-02849 and 2013-CP-02-02850  
Appellate Case No. 2015-002417

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

Tommie Rae Brown.....Respondent,

**RECEIVED**

v.

JUN 22 2017

David C. Sojourner, Jr., in his capacity as Limited  
Special Administrator and Limited Special Trustee,  
Deanna Brown-Thomas, Yamma Brown, Venisha Brown,  
Larry Brown, Terry Brown and Daryl Brown .....

**SC Court of Appeals**

Respondents below,

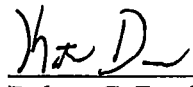
Of whom David C. Sojourner, Jr., in his capacity as  
Limited Special Administrator and Limited Special Trustee,  
Deanna Brown-Thomas, Yamma Brown, Venisha Brown,  
Terry Brown, Michael Deon Brown and Daryl Brown are the ..... Appellants.

**MOTION TO RELIEVE AS COUNSEL**

Appellants Deanna Brown-Thomas, Yamma Brown, and Venisha Brown,  
together with appellant Terry Brown (collectively, "Appellants"), by and through their  
respective undersigned counsel, hereby move the Court for an Order relieving Amber  
Carter as counsel for Appellants, as Ms. Carter is no longer employed with the law firm  
of Parker Poe Adams & Bernstein LLP and is instead now employed by the South  
Carolina Public Employee Benefit Authority. This Motion is filed with the express  
consent of Ms. Carter and is intended to avoid confusion and delay in the service of

documents and notices in this matter. Robert C. Byrd, Esq. and A. Smith Podris, Esq. shall continue as counsel of record for the Appellants.

Respectfully submitted,

 for Robert C. Byrd

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Attorneys for Appellants

Deanna Brown-Thomas, Dr. Yamma Brown,  
and Venisha Brown

With consent of



Amber Carter, SC Bar #78706

June 22, 2017

OF COUNSEL

*Pro Hac Vice:*

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THE STATE OF SOUTH CAROLINA  
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**SC Court of Appeals**

Doyet A. Early, III, Circuit Court Judge

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

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v.

David C. Sojourner, Jr., in his capacity as Limited  
Special Administrator and Limited Special Trustee,  
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 that on 22, 2017, s/he has caused a copy  
of the Motion to Relieve as Counsel to be served upon all parties of record by mailing a  
copy of the same addressed as follows:

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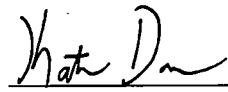
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June 22, 2017

**VIA HAND DELIVERY**

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

**RECEIVED**

**JUN 22 2017**

**SC Court of Appeals**

**Re: In Re: *The Estate of James Brown a/k/a James Joseph Brown, Tommie Rae Brown v. David C. Sojourner, Jr., et al.***  
**Appellate Case No. 2015-002417**

Dear Mrs. Kitchings:

Enclosed for filing please find an original and seven (7) copies of the following in the above-referenced appeal:

1. Motion to Relieve as Counsel [with Certificate of Service]; and
2. Motion to Accept Late Service [with Certificate of Service].

Please return a filed-stamped copy of each of the documents with our courier.

By copy of this letter, we are serving all parties of record who have filed briefs in this matter with a copy of the same. Should you have any questions, please do not hesitate to contact me.

With kindest regards, I am

Sincerely,

Katon E. Dawson, Jr.

KED:kxl  
Enclosures

cc w/enc.: All Counsel of Record

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