

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 23 2017

**SC Court of Appeals**

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

Appellate case No. 2015-002417

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

Tommie Rae Brown, Respondent,

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 Deanna Brown-Thomas, Yamma Brown, Venisha Brown, Terry Brown, Michael Deon Brown and Daryl Brown are the Appellants.

FINAL BRIEF OF APPELLANT MICHAEL DEON BROWN

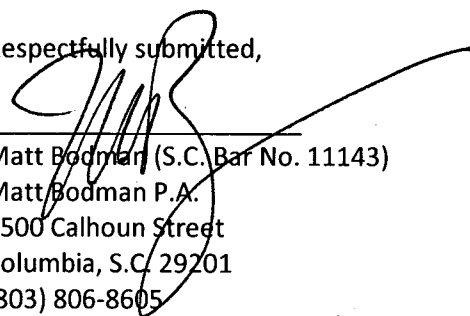
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Attorneys for Appellant Michael Deon Brown

Michael Deon Brown, by and through his undersigned counsel, adopts all of the final brief with citations to the record pursuant to SCACR 208(b)(6) of Appellant David C. Sojourner Jr., in his capacity as Limited Special Administrator of the Estate of James Brown and Limited Special Trustee of the Estate of James Brown Irrevocable Trust.

In the event that this Court does not allow Appellant Michael Deon Brown to adopt in full Appellant David C. Sojourner's brief, then Appellant Michael Deon Brown in the alternative hereby adopts all of the final brief previously filed by Appellant Terry Brown with citations to the record pursuant to SCACR 208(b)(6).

Respectfully submitted,



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June 22 2017

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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 Joseph 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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CERTIFICATE OF COUNSEL

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The undersigned certifies that this Final Brief complies with Rule 211(b), SCACR.



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June 22, 2017

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PROOF OF SERVICE

The undersigned hereby certifies that on June <sup>23</sup> 2017, he has caused a copy of the FINAL BRIEF OF APPELLANT MICAHIEL DEON BROWN to be served on all counsel in this matter by depositing a copy of it in the United States Mail, postage prepaid, addressed to the following:

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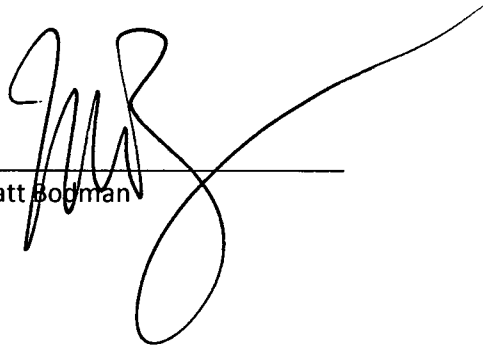
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Friday, June 23, 2017

VIA HAND DELIVERY

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

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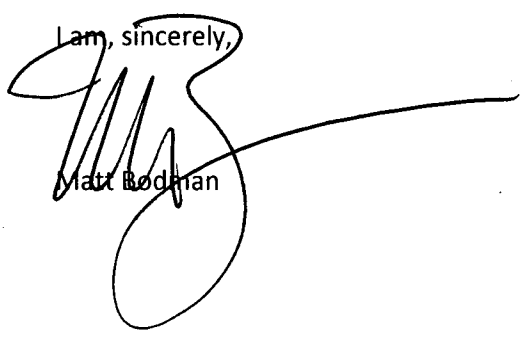
Dear Ms. Kitchings:

Enclosed please find an unbound original Final Brief of Appellant Michael Deon Brown and Proof of Service with nine bound copies.

If you have any questions or concerns please do not hesitate to contact me.

With warmest personal regards,

I am, sincerely,

  
Matt Bodman