

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

Appellate Case No. 2016-001373

**RECEIVED**  
OCT 12 2018  
SC Court of Appeals

Russell L. Bauknight, in his capacity as Personal Representative of the Estate of James Brown and Trustee of the James Brown Irrevocable Trust Agreement u/a/d August 1, 2000, 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, Tonya Brown a/k/a Sarah LaTonya Brown, Vanisha Brown, Larry Brown, Deanna J. Brown Thomas, Jason Brown Lewis and Yamma N. Brown Lumar, individually and on behalf of her minor children, Sydney Lumar and Carrington Lumar.....Respondents,

v.

Terry Brown and Darryl Brown of whom Terry Brown is the ..... Appellant.

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

**NOTICE OF AND MOTION TO WITHDRAW AS COUNSEL**

Upon Motion of the undersigned, John A. Donsbach, that he be allowed to withdraw as counsel for Appellant Terry Brown, in accordance with Rule 11(b) of South Carolina Rules of Civil Procedure, Rule 1.16(a)(3) of the South Carolina Rules of Professional Conduct and Rule 264, SCACR. Appellant has terminated counsel's services and requested counsel's withdrawal.

As such, withdrawal is appropriate under Rule 1.16(a)(3) of the South Carolina Rules of

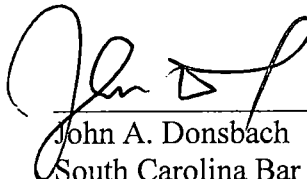
Professional Conduct and for justifiable cause under Rule 264, SCACR. Appellant Terry Brown has been made aware that his matter is scheduled for oral argument on November 7, 2018 at 11:20 AM in Courtroom 2. Appellant has been advised for the need to hire counsel to represent him at such argument and the potential adverse impact such termination could have on Appellant at this juncture in the matter. Appellant has not heeded this advice, but instead, indicated his desire to continue pro se in this matter. The address for Appellant Terry Brown for future service is:

3929 Liberty Hill Road  
Eastanollee, Georgia 30538

Counsel has not consulted with the opposing party as such consultation would serve no useful purpose.

October 10, 2018.

Respectfully submitted,



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Other counsel and parties of record:

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v.

Terry Brown and Darryl Brown of whom Terry Brown is the ..... Appellant.

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

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on October 10, 2018, he has caused a copy of the Notice of and Motion to Withdraw addressed as follows:

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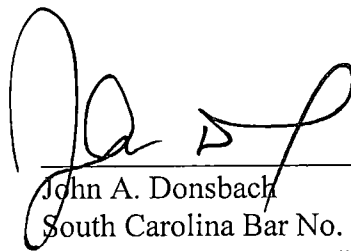
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Attorney for Terry Brown

Terry Brown  
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Eastanollee, Georgia 30538



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Attorney for Appellant Terry Brown

# DONSBACH LAW GROUP, LLC

ATTORNEYS AT LAW

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**David K. Anderson** (GA, NC)

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Facsimile (706) 651-1399

Telephone (706) 650-8750

October 10, 2018

**VIA UPS OVERNIGHT DELIVERY**

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

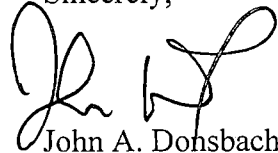
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Re: Estate of James Brown a/k/a James Joseph Brown  
Appellate Case No. 2016-001373  
C/M No.: 2497/1

Dear Ms. Kitchings:

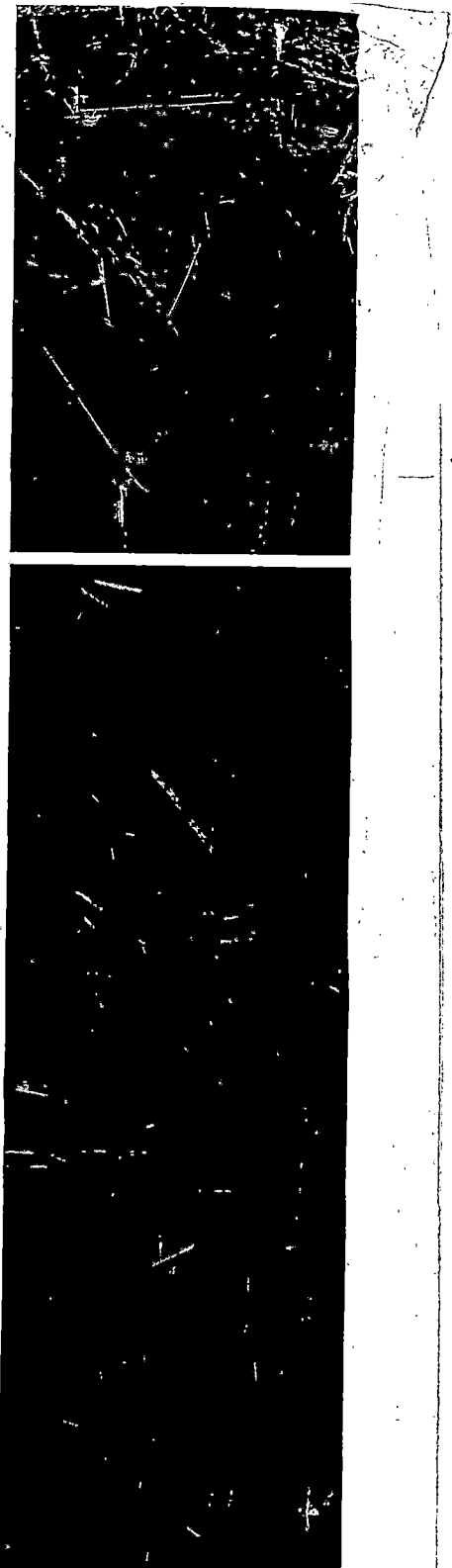
Enclosed please find an original and seven (7) copies of Notice of and Motion to Withdraw as Counsel for the above-referenced case. Also enclosed please find our firm's check in the amount of \$25.00 for the filing fee. Please file the original and six copies and return one copy to me in the enclosed self-addressed, stamped envelope. If you have any questions, please feel free to contact me. Thank you.

Sincerely,

  
John A. Donsbach

JAD/djg

Enclosures



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