

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

Jul 01 2020

S.C. SUPREME COURT

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 (Court of Appeals)
Appellate Case No. 2018-001990 (Supreme Court)

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, Michael Deon Brown, and Daryl Brown, Defendants,

Of whom Deana Brown-Thomas, Yamma Brown and Venisha Brown
are the..... Petitioners.

PROOF OF SERVICE

The undersigned hereby certifies that a copy of **TOMMIE RAE BROWN'S PETITION FOR REHEARING PURSUANT TO RULE 221(a), SCACR** has been served on all counsel of record by email and/or by depositing a copy of same in the United States Mail, postage prepaid on July 1, 2020, and addressed as follows:

John F. Beach, Esq.
Adams and Reese LLP
1501 Main Street, Fifth Floor
P.O. Box 2285
Columbia, SC 29202
john.beach@arlaw.com
*Attorneys for the Appellant Limited
Special Administrator and Limited
Special Trustee David C. Sojourner, Esq.*

Louis Levenson, Esq.
Levenson & Associates
125 Broad Street, SW
Atlanta, GA 30303
Attorney for Larry Brown

Robert C. Byrd, Esq.
A. Smith Podris, Esq.
Parker Poe Adams & Bernstein LLP
200 Meeting Street, Suite 301
P.O. Box 160
Charleston, SC 29402
bobbybyrd@parkerpoe.com
smithpodris@parkerpoe.com
*Attorneys for Petitioners Deanna Brown-Thomas,
Yamma Brown, and Venisha Brown*

OF COUNSEL
Pro Hac Vice:
Marc Toberoff, Esq.
Toberoff & Associates, P.C.
23823 Malibu Road, Suite 50-363
Malibu, California 90265
mtoberoff@toberoffandassociates.com
*Attorneys for Petitioners Deanna Brown-Thomas,
Yamma Brown, and Venisha Brown*

John A Donsbach, Esq.
Donsbach & King, LLC
504 Blackburn Drive
Augusta, GA 30907
Attorney for Terry Brown and Forlando Brown

Scott Kenley, Esq.
Kenley Kumar LLC
Two Ravinia Drive, Suite 500
Atlanta, GA 30346
Attorney for Terry Brown and Forlando Brown

William Joseph Barr, Esq.
Barr Law LLC
108 N. Academy Street
Kingstree, SC 29556-3422
*Attorney for Tonya Brown a/k/a Sara
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

Itriss Jenkins, Esq.
Itriss J. Jenkins, LLC
215 E. Bay Street, Suite 203
Charleston, SC 49401
*Attorney for Tonya Brown a/k/a Sara
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

Vera Gilford, Esq.
Post Office Box 12553
Miami, Florida 33101
*Attorney for Tonya Brown a/k/a Sara
LaTonya Brown-Fegan, Jeanette Mitchell
and Ciara Petitt and Cherquarius Williams
for LaRhonda Petitt*

A. Peter Shahid, Jr., Esq.
Shahid Law Office
89 Broad Street
Charleston, SC 29401
peter@shahidlawoffice.com
*Attorney for Guardian ad Litem,
Stephen M. Slotchiver*

J. David Black, Esq.
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, SC 29201
dblack@nexsenpruet.com
Attorney for Russell Bauknight

C. Havird Jones, Jr., Esq.
Office of the SC Attorney General
P.O. Box 11549
Columbia, SC 29211-1549

James Mixon Griffin, Esq.
Griffin & Davis Law Firm
1527 Blanding Street
Columbia, SC 29201

Daryl Brown
2223 Birnam Place
Augusta, GA 30904

Terry Brown
3929 Liberty Hill Road
Eastanollee, GA 30538

Michael D. Brown, Pro se
4141 Palm Avenue, #289
Sacramento, CA 95842

Michael Deon Brown # BK-1234
23500 Kasson Road
Tracy, CA 95304

ROSEN LAW FIRM, LLC



Robert N. Rosen (Bar. No. 4918)
18 Broad Street, Suite 201
Charleston, South Carolina 29401
(843) 377-1700
RNRosen@rosen-lawfirm.com

Attorneys for Respondent
Tommie Rae Brown

Charleston, SC
July 1, 2020

From: Robert Rosen
To: Jean Lee; David Michel; T Heyward Carter; Podris, A. Smith; MEDLIN, ALAN; Black, David; Marc Toberoff; Byrd, Robert C.; Peter Shahid; Arnold Goodstein; gmalloy@bellsouth.net; John Beach; David Sojourner; Lyndey R. Z. Bryant
Subject: In re Estate of James Brown. Tommie Rae Brown's Petition for Rehearing App. Case No. 2018-001990
Date: Wednesday, July 01, 2020 6:13:40 PM
Attachments: Tommie Rae Brown's Petition for Rehearing #2018-001990 7-1-20 .pdf

Counsel,

Attached for service upon you is Tommie Rae Brown's Petition for Rehearing Pursuant to Rule 221(a), SCACR.

Best regards,
Robert

Given the current COVID-19 situation and the government's recommendations, Rosen Law Firm will transition to a remote work environment immediately. Our employees will be available by email and voicemail throughout this period. Our main office line (843-377-1700) will continue to ring and will either be answered by our receptionist or you will be given instructions to connect to a particular person's line to leave a voicemail. We will make every effort to return calls and respond to emails as quickly as possible. Thank you for your understanding during this uncertain time. We are grateful for the trust you have placed in us, and please contact us with any questions or needs. We hope you and your family remain safe and healthy.

Robert N. Rosen, Esquire
Rosen Law Firm, LLC
The Peoples Building
18 Broad Street, Suite 201 (29401)
P.O. Box 1840
Charleston, SC 29402
843/377-1700
843/377-1709 (fax)
RNRosen@rosen-lawfirm.com

CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, and is legally privileged. This email (and any associated files) contains confidential and/or legally privileged information from the Rosen Law Firm, LLC, intended solely for the use of the individual(s) named in this email. If you are not the intended recipient, you are notified that any disclosure, copying, distribution, or the taking of any action based or in reliance upon the contents of this email (and any associated files) is strictly prohibited. If you have received this email in error, please destroy this email and notify our office via reply email.

IRS CIRCULAR 230 NOTICE: Internal Revenue Service regulations generally provide that, for the purpose of avoiding federal tax penalties, a taxpayer may rely only on formal written advice meeting specific requirements. Any tax advice in this message, or in any attachment to this message, does not meet those requirements. Accordingly, any such tax advice was not intended or written to be used, and it cannot be used, for the purpose of avoiding federal tax penalties that may be imposed on you or for the purpose of promoting, marketing or recommending to another party any tax-related matters.