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May 24, 2013

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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MAY 29 2013

Re: In re: The Estate of James Brown a/k/a James Joseph Brown,
Appellate Case No. 2012-212917

S.C. Supreme Court

Dear Ms. Abbott Kitchings:

I write in response to the "Motion and Memorandum of Adele J. Pope, Pro Se, to Dismiss Attorney General and Bauknight as Parties and Renewed Motion to Expedite Based on May 8, 2013 Decision in Wilson v. Dallas, Opinion No 29227 (May 8, 2013) and Scheduled Appointment Hearing"; and the "Affidavit of Adele J. Pope in Support of Dismissal of Attorney General Wilson and Russell Bauknight as Parties, and in Support of Renewed Motion to Expedite Appeal."

I am a bit confused as to why this Motion and Affidavit were filed in this Court as the matter to which it pertains is pending before the Supreme Court. See Order dated December 10, 2012 (attached). In any event, I must correct an assertion in Ms. Pope's filings as she has failed to do so. Ms. Pope asserts that the matter pending before the Supreme Court should be expedited because Judge Early is holding a hearing "to appoint successor PR/Trustees under the Will of James Brown and the James Brown 200 Irrevocable Trust" on May 29, 2013. This is not true. On May 17, Judge Early changed the hearing to a status conference. See May 17 Email (attached).

Sincerely,



Robert N. Rosen

RNR/cbp
Enclosures: as indicated

Cc: Adele J. Pope
1228 Walnut Street
Newberry, SC 29108

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SC Court of Appeals

May 24, 2013

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The Supreme Court of South Carolina

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

Adele J. Pope, Appellant,

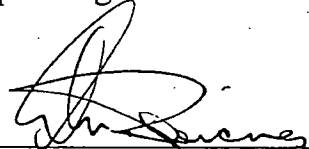
v.

Alan Wilson, Attorney General of the State of South Carolina, Russell L. Bauknight, as Special Administrator and Special Trustee for the Estate of James Brown and the James Brown 2000 Irrevocable Trust, and Tommie Rae Brown, Respondents.

Appellate Case No. 2012-213398

ORDER

Respondents move to certify this appeal to this Court pursuant to Rule 204(b), SCACR. Appellant does not oppose the motion, but requests that the appeal be expedited. We grant the motion to certify and transfer the appeal to this Court. The motion to expedite is denied without prejudice to appellant's right to renew the request following this Court's ruling on the pending motions to dismiss and to strike.



FOR THE COURT J.

Columbia, South Carolina

December 10, 2012

cc:

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MAY 29 2013

SC COURT OF APPEALS

Adele J. Pope
S. Alan Medlin
T. Heyward Carter, Jr.
Andrew W. Chandler
M. Jean Lee
David Lawrence Michel
Alan McCrory Wilson
Robert D. Cook
Clyde H. Jones, Jr.
Mary Frances G. Jowers
William W. Wilkins
J. David Black
Fred Lewis Kingsmore, Jr.
Robert N. Rosen
Christopher Brian Paton
Matthew Day Bodman
Louis Levenson
Albert P. Shahid, Jr.
The Honorable Jenny Kitchings

From: Early, Doyet A. Law Clerk (Adam C. Ness)
To: [Chris B. Paton](mailto:Chris.B.Paton)
Cc: louis@levensonlaw.com; Early, Doyet A.; AGSJONES@scag.gov; Adele Pope; rbuchananjr@atlanticbbn.net; dwilliams@jeterandwilliams.com; FKingsmore@nexsenpruet.com; Robert Rosen; MFJowers@scag.gov; AJH@swblaw.com; MVG@swblaw.com; Michel, David L.; dallaslaw@classicsouth.net; dblack@nexsenpruet.com; rbauknight@bpscpas.com; gcovington@covpatlaw.com; amedlin@sc.rr.com; shahidlo@bellsouth.net; steve@slotchiverlaw.com
Subject: RE: James Brown - hearing to set new PR
Date: Friday, May 17, 2013 11:07:48 AM

Dear All:

Please be advised that Judge Early will use the May 29th hearing date to conduct a status conference. At the status conference, he will expect that each of you be prepared to discuss the future track of the James Brown Estate and Trust litigation. By way of example: now that the settlement agreement has been reversed, what cases are presently pending, and how do the parties propose to move their respective cases forward?

Also, as a general housekeeping matter, please be advised that when any party seeks a ruling from Judge Early, they will be expected to comply with **standard motions practice** protocol—that is, filing a motion, accompanied by the proper motion coversheet and filing fee, etc. Thank you in advance.

Sincerely,

Adam C. Ness, Esq.

Law Clerk to the Honorable D.A. Early, III
The Circuit Court of the 2nd Judicial Circuit
PO Box 90
Bamberg, SC 29003
Telephone: 803.245.4004
Fax: 803.245.2983
dearlylc@sccourts.org

From: Early, Doyet A. Law Clerk (Adam C. Ness)
Sent: Wednesday, May 15, 2013 9:49 AM
To: Chris B. Paton
Cc: louis@levensonlaw.com; Early, Doyet A. Law Clerk (Adam C. Ness); Early, Doyet A.; AGSJONES@scag.gov; Adele Pope; rbuchananjr@atlanticbbn.net; dwilliams@jeterandwilliams.com; FKingsmore@nexsenpruet.com; Robert Rosen; MFJowers@scag.gov; AJH@swblaw.com; MVG@swblaw.com; Michel, David L.; dallaslaw@classicsouth.net; dblack@nexsenpruet.com; rbauknight@bpscpas.com; gcovington@covpatlaw.com; amedlin@sc.rr.com; shahidlo@bellsouth.net; steve@slotchiverlaw.com
Subject: Re: James Brown - hearing to set new PR

All:

This is set for May 29th at 2:00 pm in Barnwell.

Any materials for the Judge's consideration must be received no later than the Friday before.