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Sep 29 2023

S.C. SUPREME COURT

# EXHIBIT A

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 RUSSELL L. BAUKNIGHT, as Trustee of )  
 the James Brown 2000 Irrevocable Trust and )  
 the James Brown Legacy Trust, as Personal )  
 Representative of the Estate of James Brown, )  
 and on behalf of Alan Wilson, in is capacity )  
 as Attorney General of the State of )  
 South Carolina, and others )  
 )  
 and )  
 )  
 ALAN WILSON, in his capacity as Attorney )  
 Attorney General of the State of South )  
 Carolina; and others, )  
 Plaintiffs. )  
 )  
 v. )  
 Adele J. Pope, )  
 Defendant. )  
 \_\_\_\_\_ )

) IN THE COURT OF COMMON PLEAS  
 )  
 )  
 ) Case No.: 2010-CP-40-4900

**NOTICE OF FILING OF  
 ORIGINAL DEPOSITION  
 TRANSCRIPTS**

2017 OCT 19 AM 9:18  
 JEANNETTE W. MCBRIDE  
 C.C.P. & G.S.  
 RICHLAND COUNTY  
 FILED

**TO: PLAINTIF/COUNTERCLAIM DEFENDANTS AND THEIR COUNSEL SWEENEY,  
 WINGATE & BARROW, P.C. ("Wingate") :**

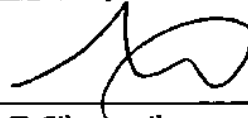
Defendant Adele J. Pope hereby gives notice of the filing of the following original transcripts of depositions in this action:

1. Sworn Statement of James B. Richardson, Jr., taken March 3, 2016;
2. Deposition of Tommie Rae Brown, taken June 16-17, 2016 (2 Volumes);
3. Deposition of Henry Dargan McMaster, taken August 18, 2016;
4. Statement on the Record, August 19, 2016;
5. Statement on the Record, August 19, 2016;
6. Deposition of Lindsey Delores Brown, taken September 19, 2016;
7. Deposition of Janise Vanisha Brown, taken September 19, 2016;

8. Attempted Deposition of Venisha Brown, September 22, 2016;
9. Deposition of Terry Brown, taken November 2, 2016;
10. Statement on the Record, November 11, 2016;
11. Deposition of Yamma Brown, taken January 27, 2017;
12. Deposition of Deanna J. Brown-Thomas, taken March 1, 2017;
13. Statement for the Record (James Brown Legacy Trust), April 3, 2017; and
14. Deposition of Jason Brown Lewis, taken June 28, 2017 (note: original not sealed by California Court Reporter).

Respectfully submitted,

W.H. Bundy, Jr.  
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October 19, 2017


*Attorneys for Defendant/Counterclaim  
Plaintiff Adele J. Pope*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has served a copy of the foregoing document on counsel for Plaintiff/CC Defendants on October 19, 2017, by depositing a copy of the same into the United States Mail, First-class postage prepaid, addressed as follows:

Kenneth B. Wingate, Esquire  
Joseph O. Thickens, Esquire  
Mark V. Gende, Esquire  
PO Box 12129  
Columbia, SC 29211

J. Emory Smith, Esquire  
PO Box 11549  
Columbia, SC 29211

  
\_\_\_\_\_  
Adam T. Silvernail

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JEANNETTE W. MCBRIDE  
C.C.P. & G.S.

# EXHIBIT B

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF RICHLAND )

) Case No.: 2010-CP-40-4900

RUSSELL L. BAUKNIGHT, as Trustee of )  
the James Brown 2000 Irrevocable Trust and )  
the James Brown Legacy Trust, as Personal )  
Representative of the Estate of James Brown, )  
and on behalf of Alan Wilson, in his capacity )  
as Attorney General of the State of South )  
Carolina; Tommie Rae Brown, individually )  
and on behalf of her minor child, James B.; )  
Daryl J. Brown, individually and on behalf of his )  
minor child Janise Vanisha Brown; Lindsey )  
Delores Brown; Deanna J. Brown Thomas; Jason )  
Brown-Lewis; Yamma N. Brown, individually )  
and on behalf of her minor children, Sydney )  
L., Carrington L., and Tonya Brown; Venisha )  
Brown; Larry Brown; and Terry Brown )

NOTICE OF FILING OF  
DEPOSITIONS

and )

TOMMIE RAE BROWN, individually and on )  
behalf of her minor child, JAMES B; DARYL J. )  
BROWN, individually and on behalf of his minor )  
child JANISE VANISHA BROWN; LINDSEY )  
ELORES BROWN; DEANNA J. BROWN )  
THOMAS; JASON BROWN - LEWIS; )  
YAMMA N. BROWN, individually and on )  
behalf of her minor children, SYDNEY )  
L., CARRINGTON L., and TONYA BROWN; )  
VENISHA BROWN; LARRY BROWN; and )  
TERRY BROWN, )

Plaintiffs. )

v. )

Adele J. Pope, )

Defendant. )

Defendant Adele J. Pope hereby gives notice of the filing of the following depositions herewith or previously:

**I. Depositions and Exhibits of Plaintiff Attorneys General (“AGs”) and staff prior to Wingate Suit dismissal, taken in Aiken County Case 2013-CP-02-1337 (“Aiken 1337”) with SWB having obtained court permission from the Honorable Doyet A. Early, III (“Judge Early”) to participate to protect SWB’s “client,” the AG:**

1. Deposition of Sr. Asst. AG Clyde Havird “Sonny” Jones, May 4, 2016
2. Deposition of Assistant AG Mary Frances Jowers, May 4, 2016
3. Deposition of former AG Henry McMaster, October 19, 2016
4. Deposition of AG Alan Wilson, March 21, 2017
5. Deposition of Solicitor General Robert Cook, February 8, 2017
6. Deposition of Sr. Asst. AG Creighton Waters, February 9, 2017
7. Deposition of former Chief Deputy AG John McIntosh, February 8, 2017
8. Deposition of AG Auditor, Sandra Matthews, February 8, 2017

## **II. Depositions, with Exhibits, of other parties, Wingate Suit (Taken in Richland County Case 2010-CP-40-4900)**

1. Deposition of Plaintiff Daryl Brown, December 21, 2012
2. Deposition of Plaintiff Larry Brown, January 8, 2013
3. Deposition of Plaintiff Tonya (LaTonya) Brown Fegan, February 8, 2013
4. Deposition of Defendant Robert L. Buchanan, Jr., February 21, 2013
5. Deposition of Plaintiff Deanna Brown-Thomas, March 1, 2017  
(Filed on October 19, 2017 herein)
6. Deposition of Plaintiff Yamma Brown, January 27, 2017  
(Filed on October 19, 2017 herein)
7. Deposition of Plaintiff Venisha Brown (non-appearance), September 22, 2016  
(Filed on October 19, 2017 herein)
8. Deposition of Plaintiff Terry Brown, November 2, 2016  
(Filed on October 19, 2017 herein)
9. Deposition of Plaintiff Tommie Rae Hynie (Brown) [incomplete], June 16-17, 2016  
(Filed on October 19, 2017 herein)
10. Deposition of Janice Brown, September 19, 2016  
(Filed on October 19, 2017 herein)
11. Deposition of Lindsay Brown, September 19, 2016  
(Filed on October 19, 2017 herein)
12. Deposition of Jason Brown-Lewis, June 28, 2017  
(Filed on October 19, 2017 herein)
13. Deposition of Henry Dargan McMaster, August 18, 2016  
(Filed on October 19, 2017 herein)

## **III. Depositions, with Exhibits in Aiken 1337 of Experts Jointly Designated by SWB/AG/Hynie/others in Wingate Suit and by Bauknight in Aiken 1337 in 2017**

1. Deposition of Julian Walker, Esq., designated by AG (SWB Plaintiffs, February 15, 2017
2. Deposition of Mark Hobbs, CPA., designated by AG (SWB)/Plaintiffs, March 20, 2017
3. Deposition of Nathan Crystal, Esq., designated by AG(SWB)/Plaintiffs, February 20, 2017
4. Deposition of Mark Hobbs, CPA, designated by AG(SWB)/Plaintiffs, March 20, 2017
5. Deposition of Ellison Thomas, CPA, designated by AG(SWB)/Plaintiffs, April 14, 2017
6. Deposition of Jonas Herbsman, Esq., designated by AG(SWB)/Plaintiffs, March 16, 2017
7. Deposition of Roger Miller, termination rights expert, AG(SWB)/Plaintiffs, March 16, 2017

**IV. Depositions, with Exhibits, of Parties, Witnesses and Experts taken in Other Cases**

1. Deposition of Everett Kendall, by Order of Judge Jean Toal, Aiken 1337, March 6, 2017
2. Deposition of Kenneth Wingate, Esq., by Order of Judge Toal, Aiken 1337, March 6, 2017
3. Deposition of Thomas Pope, Esq. (FOIA counsel to reporter) Aiken 1337, April 11, 2017
4. Deposition of R.B. Alexander, Pope designated expert, Aiken 1337, March 27, 2017
5. Deposition of Steven Johnson, Pope designated expert, Aiken 1337, July 20, 2016
6. Deposition of Wallace Lightsey, Pope designated expert, Aiken 1337, April 10, 2017
7. Deposition of Russell Bauknight, Case 3:08-cv-00014-WOB, August 20, 2013
8. Deposition of Russell Bauknight, Aiken 1337, January 31, 2017
9. Deposition of Wm. Jeffrey Smith, co-author of "Private Foundations..." March 14, 2017
10. Deposition of James Hardin, Esq. Pope designated expert, Aiken 1337, March 23, 2017
11. Deposition of Dr. Terry Cox, designated by Pls/Def, Aiken 1337, April 12, 2017
12. Deposition of William James (Forlando) Brown, 3:08-cv-00014-WOB, April 10, 2013
13. Deposition of Louis Levenson, Esq., Aiken 1337, November 1, 2017

Respectfully submitted,

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August 3, 2023

*Counsel for Defendant Adele J. Pope*