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Feb 23 2024

S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

**APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Clifton B. Newman, Circuit Court Judge**

Appellate Case No. 2023-001253

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. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown

And

Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor children Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown, Plaintiffs,

Of whom 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. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown

And

Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor children Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown, are Respondents,

v.

Adele J. Pope, Appellant.

PROOF OF SERVICE

The undersigned counsel for Respondents certifies that this day he has served a copy of the following upon Appellant:

1. Motion to Consolidate and Transfer by Respondents

Said service upon Appellant having been accomplished by emailing a copy of same to her and her counsel of record, as follows:

Adam T. Silvernail Law Office of Adam T. Silvernail, LLC P.O. Box 7995 Columbia, SC 29202 adam@silvernailfirm.com <i>Counsel for Appellant in Case Nos. 2023-1253 and 2023-1941</i>	Daryl L. Williams Gertz & Moore, LLP P.O. Box 456 Columbia, SC 29202 dwilliams@gertzandmoore.com daryl@williamslawfirm.com <i>Counsel for Appellant in Case Nos. 2023-1253 and 2023-1941</i>
William Jeffrey Smith 1216 Crenshaw Street Newberry, SC 29108 wjstv@mindspring.com <i>Counsel for Appellant in Case Nos. 2023-1253 and 2023-1941</i>	Adele J. Pope, Esq. adele@popelawfirm.com <i>Pro se, as to pending S. Ct. Petition referenced above (filed Feb. 7, 2024, no case number assigned yet)</i>

Additional service:

J. David Black, Esq. Kirsten E. Small, Esq. Maynard Nexsen, PA 1230 Main Street, Suite 700 Columbia, SC 29201 dblack@maynardnexsen.com ksmall@maynardnexsen.com <i>Counsel for Respondent Estate of James Brown in pending S. Ct. Petition referenced above (filed Feb. 7, 2024, no case number assigned yet)</i>
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I so certify:

s/ Aaron J. Hayes

Aaron J. Hayes

Sweeny, Wingate & Barrow, P.A.

P.O. Box 12129

Columbia, SC 29211

(803) 256-2233

Attorney for Respondents

February 23, 2024

Columbia, South Carolina

From: [Aaron J. Hayes](#)
To: [Adam Silvernail](#); [Daryl Williams](#); daryl@williamslawfirm.com; [Jeff Smith](#); [Adele Pope](#)
Cc: [Mark V. Gende](#); [Ken B. Wingate](#); [J. David Black](#); [Kirsten E. Small](#); [Katherine Indovino](#); [Tiffany N. Nelson](#)
Subject: Service: Respondents Motion to Transfer/Consolidate RE: Case Nos. 2023-1253, 2023-1941, and 2024-_____
Attachments: [Case 2023-1253 - Motion to Consolidate and Transfer.PDF](#)
[Case 2023-1253 - POS - Motion to Consolidate and Transfer.PDF](#)

Counsel and Respondent Pope:

Attached for service upon you are:

1. Motion to Consolidate and Transfer by Respondents, filed in Case No. 2023-1253 and affecting Case Nos. 2023-1941 and 2024-____ (the Feb. 7, 2024 Petition, no case number assigned yet).
2. Proof of Service

A copy of this email will be transmitted along with the above-referenced documents when they are submitted for electronic filing this morning.

Thank you,



Aaron J. Hayes | *Of Counsel*
Sweeny, Wingate & Barrow, P.A.

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