

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

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**RECEIVED**

**Mar 05 2024**

**S.C. SUPREME COURT**

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

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**Appellate Case No. 2023-001253**

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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.

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**PROOF OF SERVICE**

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

1. Respondents' Reply to Appellant's Return to 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 <a href="mailto:adam@silvernailfirm.com">adam@silvernailfirm.com</a> <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 <a href="mailto:dwilliams@gertzandmoore.com">dwilliams@gertzandmoore.com</a> <a href="mailto:daryl@williamslawfirm.com">daryl@williamslawfirm.com</a> <i>Counsel for Appellant in Case Nos. 2023-1253 and 2023-1941</i>
William Jeffrey Smith 1216 Crenshaw Street Newberry, SC 29108 <a href="mailto:wjstv@mindspring.com">wjstv@mindspring.com</a> <i>Counsel for Appellant in Case Nos. 2023-1253 and 2023-1941</i>	Adele J. Pope, Esq. <a href="mailto:adele@popelawfirm.com">adele@popelawfirm.com</a> <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 <a href="mailto:dblack@maynardnexsen.com">dblack@maynardnexsen.com</a> <a href="mailto:ksmall@maynardnexsen.com">ksmall@maynardnexsen.com</a> <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*

March 5, 2024  
Columbia, South Carolina

**From:** [Aaron J. Hayes](#)  
**To:** [Adam Silvernail](#); [Daryl Williams](#); [daryl@williamslawfirm.com](mailto: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' Reply to Returns to Motion to Transfer/Consolidate RE: Case Nos. 2023-1253, 2023-1941, and 2024-\_\_\_\_  
**Attachments:** [Case 2023-1253 - Reply to Return to Motion to Consolidate and Transfer.PDF](#)  
[Case 2023-1252 - POS - Reply to Return to Motion to Consolidate and Transfer.PDF](#)

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Counsel and Respondent Pope:

Attached for service upon you are:

1. Respondents' Reply to Returns to Motion to Consolidate and Transfer, 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 afternoon.

Thank you,



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

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