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**Apr 30 2024**

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 his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James Brown II; 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 Lumar and Carrington Lumar; Tonya Brown; Venisha Brown Larry Brown; and Terry Brown

and

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 BROWN II; 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 LUMAR and CARRINGTON LUMAR; TONYA BROWN; VENISHA BROWN; LARRY BROWN; and TERRY BROWN,

Plaintiffs

v.

Adele J. Pope,

Defendant

IN THE COURT OF COMMON PLEAS

FOR THE FIFTH CIRCUIT

Civil Action No. 2010-CP-40-4900

2017 FEB - 1 AM 10:02  
STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

SECOND  
AMENDED  
CONFIDENTIALITY ORDER

Whereas this Court has determined that a Confidentiality Order is necessary in this case and certain discovery material herein is and should be treated as confidential; accordingly, it is ORDERED:

1. **Scope.** All documents produced in the course of discovery herein, all responses to discovery requests, and all deposition testimony and deposition exhibits, all documents referenced in this Court's Administrative Order of August 30, 2016 (filed September 1, 2016) in Aiken County Case 2013-CP-02-1337, and any other materials which may be subject to discovery (hereinafter collectively "documents") shall be subject to this Order concerning confidential information, as set forth below.

2. **Form and Timing of Designation.** Confidential documents shall be so designated by placing or affixing the word "CONFIDENTIAL" on the document in a manner which will not interfere with the legibility of the document and which will permit complete removal of the Confidential designation. Documents shall be designated CONFIDENTIAL prior to, or contemporaneously with, the production or disclosure of the documents. However, the inadvertent or unintentional production of documents without prior designation as confidential shall not be deemed a waiver, in whole or in part, of the right to designate documents as CONFIDENTIAL, as otherwise allowed by this Order.

3. **Documents Which May be Designated Confidential.** Any party may designate documents as confidential, but only after review of the documents by an attorney who has, in good faith, determined that the documents contain information properly protected from disclosure by statute or regulation, or which contain sensitive personal information, trade secrets, research, development, or business/commercial information that justifies protection from disclosure. The certification shall be made concurrently with the disclosure of the documents,

using the form attached hereto at **Attachment A**, which shall be executed subject to the standards of Rule 11 of the South Carolina Rules of Civil Procedure. Information or documents which are or have been publicly available may not be designated as CONFIDENTIAL.

4. **Depositions.** Portions of depositions shall be deemed CONFIDENTIAL only if designated as such when the deposition is taken or within seven business days after receipt of the transcript by the designating party's attorney. Such designation shall specify the portions to be protected, by page and line numbers.

5. **Protection of Confidential Material.**

(a) **General Protections.** Documents designated CONFIDENTIAL under this Order shall not be used or disclosed by the parties or counsel for the parties, or any other persons identified below (*See Section ¶ 5.b.*), for any purposes whatsoever, other than preparing for and conducting the instant litigation (including any appeal in this litigation).

(b) **Limited Third Party Disclosures.** The parties and counsel for the parties shall not disclose or permit the disclosure of any documents designated CONFIDENTIAL under the terms of this Order to any other person or entity except as set forth in subparagraphs (1)-(5) below, and then only after the person to whom disclosure is to be made has executed an acknowledgment (in the form set forth at **Attachment B** hereto), that he or she has read and understands the terms of this Order and is bound by it. Subject to these requirements, the following categories of persons may be allowed to review documents which have been designated CONFIDENTIAL pursuant to this Order:

- (i) counsel and employees of counsel for the parties who have responsibility for the preparation and trial of the lawsuit;
- (ii) parties and employees of a party to this Order, but only to the extent that prior to disclosure, counsel shall certify that the specifically named individual's assistance is necessary to the conduct of the litigation;

*MAE*  
*#3*

- (iii) court reporters engaged for depositions and those persons, if any, specifically engaged for the limited purpose of making photocopies of documents;
- (iv) consultants, investigators, or experts (hereinafter referred to collectively as "experts") employed by the parties or counsel for the parties to assist in the preparation and trial of the lawsuit; and
- (v) other persons only upon consent of the producing party or upon Order of the Court, and on such conditions as are agreed to or Ordered.

Nothing contained in this paragraph 5 is intended to or shall prevent counsel for any party from questioning a deponent about a document designated CONFIDENTIAL pursuant to this Order. In this event, counsel shall comply with the provisions of paragraph 4 above regarding designating appropriate portions of the subject deposition(s) CONFIDENTIAL. Further, Attachment B need not be obtained from the deponent prior to counsel questioning the deponent regarding the subject document(s).

(c) **Control of Documents.** Counsel for the parties shall take reasonable efforts to prevent unauthorized disclosure of documents designated as Confidential pursuant to the terms of this Order. Counsel shall maintain the originals of the forms signed, pursuant to Paragraph 5(b), by persons acknowledging their obligations under this Order.

(d) **Copies.** All copies, duplicates, extracts, summaries or descriptions (hereinafter referred to collectively as "copies"), of documents designated as CONFIDENTIAL under this Order or any portion of such a document, shall be immediately affixed with the designation "CONFIDENTIAL" if the word does not already appear on the copy. All such copies shall be afforded the full protection of this Order.

6. **Filing of Confidential Materials.** In the event a party seeks to file any material that is subject to protection under this Order with the Court, that party shall take appropriate action to insure that the documents receive proper protection from public disclosure, including:

(1) filing a redacted document with the consent of the party who designated the document as confidential; (2) where appropriate (e.g. in relation to discovery and evidentiary motions), submitting the documents solely for *in camera* review; or (3) where the preceding measures are not adequate, seeking permission to file the document under seal pursuant to the procedural steps set forth in the applicable South Carolina Rules of Civil Procedure. Absent extraordinary circumstances making prior consultation impractical or inappropriate, the party seeking to submit the document to the Court under seal shall first consult with counsel for the party who designated the document as confidential to determine if some measure less restrictive than filing the document under seal may serve to provide adequate protection. This duty exists irrespective of the duty to consult on the underlying motion. Nothing in this Order shall be construed as a prior directive to the Clerk of Court to allow any document be filed under seal. The parties understand that documents may be filed under seal only with the permission of the Court, after proper Motion pursuant to any applicable South Carolina Rules of Civil Procedure.

(7) **Greater Protection of Specific Documents.** No party may withhold information from discovery on the ground that it requires protection greater than that afforded by this Order, unless that party moves for an Order providing such special protection.

(8) **Challenges to Designation as Confidential.** Any CONFIDENTIAL designation is subject to challenge. The following procedures shall apply to any such challenge.

(a) The burden of proving the necessity of a CONFIDENTIAL designation rests with the party asserting confidentiality.

(b) A party who contends that documents designated CONFIDENTIAL are not entitled to confidential treatment shall give written notice to the party who affixed the designation of the specific basis for the challenge. The party who so designated the documents

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shall have fifteen (15) days from service of said written notice to determine if the dispute can be resolved without judicial intervention and, if not, to move for an Order confirming the CONFIDENTIAL designation.

(c) Notwithstanding any challenge to the designation of documents as confidential, all material previously designated CONFIDENTIAL shall continue to be treated as subject to the full protections of this Order until one of the following occurs:

- (i) the party who claims that the documents are CONFIDENTIAL withdraws such designation in writing;
- (ii) the party who claims that the documents are CONFIDENTIAL fails to move timely for an Order designating the documents as confidential as set forth in paragraph 8.b. above; or
- (iii) the court rules that the documents should no longer be designated as confidential information.

(d) Challenges to the confidentiality of documents may be made at any time, and are not waived by the failure to raise the challenge at the time of initial disclosure or designation.

**9. Treatment on Conclusion of Litigation.**

(a) **Order Remains in Effect.** All provisions of this Order restricting the use of documents designated CONFIDENTIAL shall continue to be binding after the conclusion of the litigation, unless otherwise agreed or ordered.

(b) **Return of CONFIDENTIAL Documents.** Within thirty (30) days after the conclusion of the litigation, including conclusion of any appeal, all documents treated as confidential under this Order, including copies as defined above (*See* Section ¶ 5.d.) shall be returned to the producing party, unless: (1) the document has been entered as evidence or filed (unless introduced or filed under seal); (2) the parties stipulate to destruction in lieu of return; or (3) as to documents containing the notations, summations, or other mental impressions of the

Handwritten signature and initials in the bottom right corner of the page.

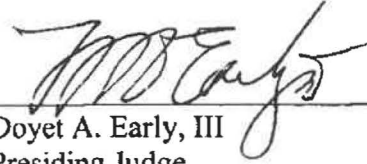
receiving party, that party elects destruction. Notwithstanding the above requirements to return or destroy documents, counsel may retain attorney work product, including an index which refers or relates to information designated CONFIDENTIAL, so long as that work product does not duplicate verbatim substantial portions of the text of confidential documents. This work product continues to be CONFIDENTIAL under the terms of this Order. An attorney may use his or her work product in a subsequent litigation, provided that its use does not disclose the confidential documents.

10. **Order Subject to Modification.** This Order shall be subject to modification on motion of any party or any other person who demonstrates an adequate interest in the matter to intervene for purposes of addressing the scope and terms of this Order. The Order shall not, however, be modified until the parties shall have been given notice and an opportunity to be heard on the proposed modification.

11. **No Judicial Determination.** This Order is entered based on the representations and agreements of the parties and for the purpose of facilitating discovery. Nothing herein shall be construed or presented as a judicial determination that any specific document or item of information designated as CONFIDENTIAL by counsel is subject to protection under Rule 26(c) of the South Carolina Rules of Civil Procedure, or otherwise, until such time as a document-specific ruling shall have been made by the Court.

12. **Persons Bound.** This Order shall take effect when entered and shall be binding upon the above named Plaintiffs and Defendant, and their respective legal counsel.

**IT IS SO ORDERED.**



\_\_\_\_\_  
Doyet A. Early, III  
Presiding Judge

1-24, 201<sup>7</sup>  
Bamberg, South Carolina.

**ATTACHMENT A  
CERTIFICATION BY COUNSEL OF DESIGNATION  
OF INFORMATION AS CONFIDENTIAL**

**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 his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James Brown II; 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 Lumar and Carrington Lumar; Tonya Brown; Venisha Brown Larry Brown; and Terry Brown

and

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 BROWN II; 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 LUMAR and CARRINGTON LUMAR; TONYA BROWN; VENISHA BROWN; LARRY BROWN; and TERRY BROWN,

Plaintiffs

**IN THE COURT OF COMMON PLEAS**

**FOR THE FIFTH CIRCUIT**

**Civil Action No. 2010-CP-40-4900**

2017 FEB -1 AM 10:05  
FILED  
CLERK OF COURT  
C.C.P. & S.S.

**CERTIFICATION BY COUNSEL OF  
DESIGNATION OF INFORMATION AS  
CONFIDENTIAL**

v.

Adele J. Pope,

Defendant

Documents produced herewith **[whose bates numbers are listed below (or) which are listed on the attached index]** have been marked as CONFIDENTIAL subject to the Confidentiality Order entered in this action.

By signing below, I am certifying that I have personally reviewed the marked documents and, in good faith believe, based on that review, that they are properly subject to protection under the terms of Paragraph 3 of the Confidentiality Order.

Date: [date Attachment A signed]

[Signature of Counsel [s/name]]

Signature of Counsel

[Printed Name of Counsel [A]]

Printed Name of Counsel

**ATTACHMENT B -  
ACKNOWLEDGMENT OF UNDERSTANDING  
AND AGREEMENT TO BE BOUND**

**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 his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James Brown II; 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 Lumar and Carrington Lumar; Tonya Brown; Venisha Brown Larry Brown; and Terry Brown

and

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 BROWN II; 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 LUMAR and CARRINGTON LUMAR; TONYA BROWN; VENISHA BROWN; LARRY BROWN; and TERRY BROWN,

Plaintiffs

**IN THE COURT OF COMMON PLEAS**

**FOR THE FIFTH CIRCUIT**

Civil Action No. 2010-CP-40-4900

COMM. PLEAS CLERK  
FILED  
2011 FEB - 1 AM 10:05  
JEANETTE JOHNSON  
C.C.P. & ASS.

**ACKNOWLEDGMENT OF  
UNDERSTANDING AND AGREEMENT  
TO BE BOUND**

v.

Adele J. Pope,

Defendant

The undersigned hereby acknowledges that he or she has read the Confidentiality Order in the above captioned action, understands the terms thereof, and agrees to be bound by such terms. The undersigned submits to the jurisdiction of the above Court in matters relating to the Confidentiality Order, and understands that the terms of said Order obligate him/her to use discovery materials designated CONFIDENTIAL solely for the purposes of the above-captioned action, and not to disclose any such confidential information to any other person, firm or concern.

The undersigned acknowledges that violation of the Stipulated Confidentiality Order may result in penalties, potentially including contempt of court.

Name: [undersigned name [att B]]

Employer: [Employer [att B]]

Business Address: [Business Address [att B]]

Date: [date Attachment B signed]

[Signature [attachment B]]

Signature

**ATTACHMENT C  
CERTIFICATION OF COUNSEL OF NEED  
FOR ASSISTANCE OF PARTY/EMPLOYEE**

**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 his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James Brown II; 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 Lumar and Carrington Lumar; Tonya Brown; Venisha Brown Larry Brown; and Terry Brown

and

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 BROWN II; 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 LUMAR and CARRINGTON LUMAR; TONYA BROWN; VENISHA BROWN; LARRY BROWN; and TERRY BROWN,

Plaintiffs

**IN THE COURT OF COMMON PLEAS**

**FOR THE FIFTH CIRCUIT**

**Civil Action No. 2010-CP-40-4900**

2017 FEB - 1 AM 10:05  
JEROME T. G. JARVIS  
C. DAN. & G.S.  
FILED

**CERTIFICATION OF COUNSEL OF  
NEED FOR ASSISTANCE OF  
PARTY/EMPLOYEE**

v.

Adele J. Pope,

Defendant

Pursuant to the Confidentiality Order entered in this action, most particularly the provisions of Paragraph 5.b.2., I certify that the assistance of [name, employer, and address of assistant [att C]] is reasonably necessary to the conduct of this litigation, and that this assistance requires the disclosure to this individual of information which has been designated as CONFIDENTIAL.

I have explained the terms of the Confidentiality Order to the individual named above and will obtain his or her signature on an "Acknowledgment of Understanding and Agreement to be Bound" prior to releasing any confidential documents to the named individual. I will disclose only such confidential documents as are reasonably necessary to the conduct of the litigation.

Date: [date Attachment C signed]

[Signature [attachment C]]  
Signature

# Exhibit B

# James Brown (1 of 4)

Official PR and/or Trustees	Cannon & Dallas Trustees - 2000 Trust							
	Beneficiaries: James Brown, 7 Grandchildren, & Needy Students <sup>1</sup> Aug 2000 - Nov 2007							
Others								
Benefits & Breaches		Cash Received \$9,436,106*	Cash Received \$5,187,246*	Cash Received \$12,919,616*	Cash Received \$10,362,448*	Cash Received \$8,298,450*	Cash Received \$9,022,123*	
		<sup>Benefit</sup> Pre-Nup before Ceremony with Tommie Rae <sup>2</sup>	<sup>Benefit</sup> Assist Defense Suit by Deanna/Yamma <sup>3</sup>	<sup>Benefit</sup> Tommie Rae Marriage Discovered <sup>4</sup>	<sup>Benefit</sup> Suit Against Tommie Rae/ She Waives Claim to be Spouse <sup>5</sup>	<sup>Breach</sup> GT "Oct. 18 Letter" seeks 10% of Sale for Cannon/Dallas, More for GT, Copsidas <sup>7</sup>		
		Cannon "Paid" \$2,284,687*	Cannon "Paid" \$946,060*	Cannon "Paid" \$2,655,717*	Cannon "Paid" \$415,255*	Cannon "Paid" \$708,895*	Cannon "Paid" \$1,183,152*	
				Phil Farr Understates Income on Tax Returns by \$3 million per Year (2003-2006) <sup>8</sup>				
Buchanan/ Pope								
Attorney General								NY Lawsuit Follows RBS \$42 Million Professional Appraisal (May 2006) <sup>9</sup>
Bauknight			Deanna/Yamma Sue James Brown					James Brown Dies Dec 25, 2006 →
Cannon & Dallas								
Other Events		James B. Born	Brown/Hynie Ceremony	Harland Howard Dies		Ray Charles Dies		Brown Discusses Estate Plan with Tommie Rae & 6 Named Children
	2000	2001	2002	2003	2004	2005	2006	
	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D

\*Ellison Thomas Chart

# Exhibit C

# James Brown (2 of 4)

Official PR and/or Trustees		PR/ Trustees Jan - Nov 2007	Buchanan/Pope PR/Trustees Nov 2007-May 2009 <small>Beneficiaries same except household goods claimed by children</small>	
Others	Nov. 2007 Hearing SA's Proposed IRS Valuation Formula Presented. JG Early Rejects Hiring of NY Attorney and Appraiser <sup>6</sup>	Buchanan/Pope SA's Mar - Nov 2007 <sup>10</sup>	<ol style="list-style-type: none"> <li>1. Sue GT/Cannon/Dallas for \$17 Million Missing <sup>16</sup></li> <li>2. Sue Morgan Stanley, Farr, Others <sup>17</sup></li> <li>3. Resolve \$30+ Million of Claims <sup>18</sup></li> <li>4. Obtain Order to Determine Heirs, State &amp; Fed for Protection of Copyrights, Estate Plan <sup>19</sup></li> <li>5. Hire Ray Gonzalez, Alan Rothschild, Jeff Smith, Tressa Hayes <sup>20</sup></li> <li>6. Income \$7+ Million <sup>21</sup></li> <li>7. Buchanan/Pope Defend Forlando Suit Attempt to Return Cannon &amp; Dallas <sup>22</sup></li> <li>8. Martin Cribbs, GreenLight Publicity Rights Contract <sup>23</sup></li> </ol>	
Benefits & Breaches		Peeples DNA Protocol <sup>11</sup>		AG/Bauknight Reject GreenLight Contract <sup>32</sup>
		Byrd/Dallas Release Tommie Rae Handwritten Admissions She Was Married Before 2001 Ceremony <sup>13</sup>	Dallas, Deanna, TR, Forlando Interfere w/ Christie's Sale <sup>24</sup>	AG Claims Right to Declare Heirs, Distribute James Brown Assets (Aug. 10, 2008) <sup>27</sup> May 26, 2009 Judge Early Approves AG's Settlement <sup>33</sup>
		Breach \$5 Million "Check to Nobody" Discovered <sup>14</sup>	AG Opposes Hiring Few Gilreath; Appears on WIS-TV w/ Forlando. Delays 75th Birthday Special <sup>25</sup>	Aug 12, 2008 AG Assumes Control "Stand Down" Email Appoints Bauknight <sup>28</sup>
Buchanan/Pope				
Attorney General		Sept. 2007 AG Enters To Protect Needy Students <sup>15</sup>	Aug 10 2008 AG Declares Tommie Rae Spouse! Gives 25% of 'I Feel Good' Assets Stops DNA Testing <sup>26</sup>	Jan. 2009 Bauknight Recommends AG's Settlement <sup>29</sup>
Bauknight		Brown #11 Forbes Top Earning Dead Celebrities - \$5 Million	Forlando/Bell Sue to Reinstate Cannon/Dallas	Settling Parties Refuse Tax Meeting with Sellars
Cannon & Dallas		Elvis #1 Bob Marley #12		
Other Events		Ray Charles Foundation \$49,462,281	Forlando & Bell File False Grievances and Affidavits	
		<b>2007</b>	<b>2008</b>	<b>2009</b>

\*Ellison Thomas Chart

J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D

# Exhibit D

# JAMES BROWN: ONE YEAR LATER

## The family circle

Much of the controversy surrounding James Brown's estate stems from family uncertainty. Only six children are named as heirs in his will, but five others are claiming they have a birthright to the Godfather of Soul's legacy. Here's a look at some of the women in Mr. Brown's life and the children said to be a product of those relationships.

**THE CHILDREN**

**THE WOMEN**

**JAMES JOSEPH BROWN II (2001):** Although Mr. Brown's estate has questioned whether this child is Mr. Brown's, his mother says she won't submit to a DNA test until all the other children undergo testing.



**TEDDY BROWN (1954):** He died in a car crash near Elizabethtown, N.Y., in 1973.



**TERRY BROWN (1955)**



**LADY BROWN (1958)**



**VELMA WARREN:** Mr. Brown's first wife. They met in Toxoco, Ga., when Mr. Brown's gospel group sang at her church, according to his autobiography, *James Brown: The Godfather of Soul*. They married in 1953, separated in 1964 and divorced in 1969.



**DARYL BROWN (1960)**



**BEA FORD:** One of Mr. Brown's protégés, she was the wife of soul singer Joe Tex, Mr. Brown's label-mate and rival. (Lapord has it that Mr. Brown once fired shots at him after he mocked his cape routine on stage.) After Ms. Ford left Mr. Tex to join the James Brown Revue, Mr. Tex released *You Keep Her*.



**RUBY SHANNON:** Mr. Brown spotted her in the crowd at one of his shows in Los Angeles, and she became his on-the-road girlfriend in the early 1960s. When she became pregnant, she left Mr. Brown and returned to her family in Houston. She died in 1975.



**LARHONDA PETTIT (1961)**



**ADRIENNE RODRIGUEZ:** She was Mr. Brown's third wife. They met in Los Angeles when Mr. Brown appeared on *Soul Gold*, according to his autobiography. She was the hairstylist and makeup artist for the show. They were married from 1984 to 1996, when she died after liposuction surgery. They did not have any children.



**CHRISTINE MITCHELL:** She met Mr. Brown at one of his concerts in Miami after he spotted her in the crowd and arranged for her to go backstage. They went on to have a long-term relationship. She died of meningitis in 1991.



**JEANETTE MITCHELL (1978)**



**DEIDRE JENKINS:** She was Mr. Brown's second wife. In his autobiography, he says she was from Baltimore and they probably first met when he was playing a gig at a Maryland beach. They were married from 1970 to 1981.



**DEANA B. THOMAS (1969)**



**YAMMA B. LUMAR (1972)**



**MARY FLORENCE BROWN:** She is the founder and president of the Sacramento, Calif., chapter of the James Brown Fan Club.



**YVONNE FAIR:** Another of Mr. Brown's musical protégés, she got her start as a member of the Chantels and the James Brown Revue. She recorded *I Found You* with Mr. Brown, which he later altered into the megahit *I Got You (I Feel Good)*. Ms. Fair went on to play a role in the movie *Lady Sings the Blues* and pursued a solo career in the 1970s. She died in 1994.



**YERSHA BROWN (1965)**



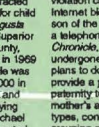
**LEA JENNER:** She met Mr. Brown at a concert in Vancouver and flew to a few of his concerts in the United States. She was 17 years old when she gave birth to Mr. Brown's daughter.



**NICOLE PARRIS (1968)**



**MICHAEL DEON BROWN (1968):** His mother waged a protracted battle against Mr. Brown for child support. According to *Augusta Chronicle* archives, the Superior Court of Sacramento County, Calif., ordered Mr. Brown in 1969 to pay \$500 per month. He was also ordered to pay \$35,000 in attorney's fees and costs, and was later sued for not paying \$3,506.52 of the sum. Michael Brown is currently incarcerated at Rio Cosumnes Correctional Center in Elk Grove, Calif., on drug paraphernalia and parole violation charges. He writes an internet blog called "Being the son of the Godfather of Soul." In a telephone interview with *The Chronicle*, he said he has not undergone DNA testing, but he plans to do so next year. He did provide a photology of a 1969 paternity test comparing his, his mother's and Mr. Brown's blood types, concluding "that blood grouping studies do not exclude Mr. James Brown as the possible father of Michael Deon Brown."



**COLOR KEY: WHO'S WHO?**  
Heirs named in James Brown's will whose mothers were married to the Godfather

Heirs named in Mr. Brown's will whose mothers were not married to the Godfather

Marriage to Mr. Brown did not produce any children

Children who have come forward since Mr. Brown's death and have been confirmed by DNA testing

DNA testing has not been conducted to determine whether Mr. Brown is the father

DNA testing has not been conducted to determine whether Mr. Brown is the father; the mother's marriage to him is in question

— Johnny Edwards, Staff Writer