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SC Court of Appeals

**STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM AIKEN COUNTY
Court of Common Pleas
The Honorable Clifton Newman, Circuit Court Judge
The Honorable Courtney Clyburn Pope, Circuit Court Judge**

Case No. 2026-000330

Trial Court Case No. 2013-CP-02-1337

Adele J. Pope..... Appellant,

v.

Estate of James Brown and the James Brown 2000 Irrevocable Trust..... Respondents.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Adele J. Pope, *Pro se*
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Pursuant to Rule 209, SCACR, Appellant Adele J. Pope designates the following items for inclusion in the Record on Appeal:

ORDERS

(Additional Orders may be part of listing in other categories.)

1. Order of the Honorable Clifton Newman, dated February 26, 2020
2. Order of Court of Appeals October 14, 2020
3. Order of Supreme Court, dated June 10, 2015
4. Form 4 Order of the Honorable Courtney Clyburn Pope, dated January 8, 2026

PLEADINGS & MOTIONS

(Additional Pleadings & Motions may be part of listing in other categories.)

1. Motion to Dismiss of Buchanan & Pope, 2010 (Richland 4900)
2. Motion of Estate for Sanctions, February 7, 2024 (Motion only)
3. Return and Opposition to Motion for Sanctions with Exhibits, filed February 15, 2024
4. Return to Request for Original Jurisdiction, February 15, 2024
5. Return of Wm. J. Smith to Motion for Sanctions, April 30, 2024
6. Reply to Return to Motion for Sanctions, dated May 7, 2024
7. Motion for Recusal and Return of Funds with Exhibits, July 23, 2025
8. Motion of Estate/2000 Trust to Strike, dated August 6, 2025
9. Motion of Pope (Re: Recusal and other Relief) with Exhibits, November 5, 2025
10. Return to Motion to Strike with All Attachments, November 13, 2025
11. Motion to Alter or Amend, December 1, 2025

HEARINGS

(Additional Hearings may be part of listing in other categories.)

1. Hearing dated January 31, 2020 Pages 1-25
2. Hearing dated November 2, 2020 Pages 1 & 2, 91-95
3. Hearing dated November 20, 2025 Pages 1-35

AFFIDAVITS

(Additional Affidavits may be part of listing in other categories.)

1. Affidavit Opposing Payment into Court with Toberoff Complaint & Exhibit B, dated February 15, 2018
2. Affidavit of Pope Re: Payment of \$47,972 dated August 31, 2020
3. Affidavit of Peter Afterman Filed Motion October 14, 2020
4. Affidavit Related to False Statements of David Black with Exhibits, September 2, 2025

DEPOSITIONS

(Additional Affidavits may be part of listing in other categories.)

1. Deposition of Sonny Jones, May 4, 2016, pp. 1, 2, 61 & May 6, 2015, pp., 1-2, 16-20, 141-145, 201-204
2. Deposition of Henry D. McMaster, October 19, 2016, pp. 1- 2, 18-19, 50, 83-92
3. Deposition of Walter F. Williams, January 26, 2017, pp. 1, 2, 5-6, 13-15
4. Deposition of Alan Wilson pages 1-2, 16-17, 28-32, 79
5. Deposition of Hynie Brown 6/16/16, 1-3, 28-36, 39-43, 61-62,81-83, 86,112-113
6. Deposition of Mary Frances Jowers 5/3/16, pp. 1-2, 142-146
7. Deposition of Chief Deputy AG John McIntosh, 2/8/17, pp. 1-2, 30-36
8. Deposition of Roger Miller, 3/16/17, pp. 1-2, 10, 24-28, 40 -42, 46-49
9. Deposition of Robert Cook, February 8, 2017, pp. 1- 2, 9, 10, 3-21, 25, 27, 29-33, 36-39, 41-49, 52-53, 55-56, 62, 68, 70-71, 73-75, 78, 81, 84, Ex.6
10. Deposition of Sandra Matthews, February 9, 2017, pp. 1, 2, 7, 8
11. Deposition of Sr. Assistant AG Creighton Waters, February 9, 2017, pp. 1, 2, 19, 30-36
12. Deposition of Russell Bauknight, dtd. 1/31/17, pp. 1-2
13. Deposition of Kenneth Wingate, 3/6/17, pp. 1-3
14. Deposition of Everett Kendall, Esq., 3/6/17, pp. 1-3
15. Deposition of Wm. Jeffrey Smith, 3/14/17, pp. 1-2
16. Deposition of Wallace Lightsey, 4/10/17, pp. 1-2
17. Deposition of James Hardin, Esq., 3/23/17, pp. 1-2
18. Deposition of Steven Johnson, 7/20/16, pp. 1-2
19. Deposition of William Sellars, CPA, /2017, pp. 1-2
20. Deposition of Jonas Herbsman, 3/16/17, pp. 1-2
21. Deposition of Mark Hobbs, CPA, 2017, pp. 1-3

OTHER MATERIALS

1. Memorandum "Pete" Logan, Special Investigator, Re: Index of Documents from the Estate of James Brown, September 2, 2009
2. Email of Black dated December 17, 2010, Exhibit A, Ret, Filed 11/13/25
3. Email of Terry Bradford Cox, Ph.D. to Sonny Jones, dated January 17, 2011 "To confirm our MTG...Jan 19"
4. Letter of Black to Pope, dated July 15, 2011 Re: Request for Documents under FOIA
5. Letter of SWB to AG dated 2012 Exhibit B, Ret, Filed 11/13/25
6. Letter of SWB (Kendall) to AG March 25, 2013 Re: Urgent Meeting Request
7. Letter of SWB to AG April 23, 2013
8. Letter of AG McIntosh to SWB April 24, 2013, Exhibit G, Filed 10/14/20
9. Letter of Gende to Judge Manning, date March 27, 2013 Re: (4900)
10. Notice of Disallowance of Claim, dated 5/29/2013
11. Status Report of Judge Early to Supreme Court Filed 5/8/2015
12. Affidavit of Peter Afterman dated November 13, 2019
13. Demand for Notice, Deanna Brown Thomas dated February 25, 2020
14. Letter of Bauknight to Probate Court, dated 3/9/2020 with Accounting Cover Pages
15. Affidavit of Pope Re: Payment of \$47,972 dated August 31, 2020
16. Exhibits 2, 3, 4, 5 Filed in Richland 4900 March 3, 2020 (Affidavit Bauknight, What Rosen Wants, What Levenson Wants, Bauknight/ Legacy Fraud)
17. Letter of AG (Smith to Silvernail) dated May 20, 2020
18. Letter of AG to Sue Summer w/ Greene Affidavit dated March 4, 2021, Filed 9/2/25
19. Letter of Mark V. Gende to Judge Newman, dated June 9, 2021
20. Email of David Black to Judge Newman with copy to Sonny Jones subject: Adele Pope Appeals, dated February 4, 2022
21. Pullman \$11.5 Million Claim 2022
22. Notice of Filing of Depositions, August 3, 2023
23. Documents Dated CONFIDENTIAL PURSUANT TO 8/30/16 ORDER including portions of Estate Tax Returns, Estate Inventory & Will & Trust, 245, 248, 275, 276, 292, 305-308, 315-319, 321, 325, 328, 329 331-336, 349, 354-357, Exhibit B, Ret, 11/13/2025
24. Letter of AG to Pope dtd. March 21, 2024
25. Partial Letter of Pope to Zelenka April 2, 2024 Filed, Ret, 11/13/2025
26. Letter of AG to Pope dated April 4, 2024 (FOIA Request in Abeyance)
27. Email of Pope to Zelenka dated April 4, 2024 with Charts 9 and 10
28. Pope Request for Information from Zelenka dated April 10, 2024 Exhibit C, Ret, 11/13/2025
29. Letter of Pope to AG Don Zelenka, and Cook dated April 15, 2024, Ret, 11/13/25 in Aiken 1337
30. Letter of AG to Summer dated April 24, 2024, with Notations
31. Affidavit of Pope Opposing Motion for Sanctions dated April 30, 2024
32. Affidavit of Silvernail Re: CDs and Custody Receipt April 21, 2025
33. Letter of Pope to Judge Newman, dated July 7, 2025, Re: Rule 11, etc.
34. Affidavit...False Statements of David Black dated September 2, 2025

35. Letter to AG Wilson October 2, 2025 (\$1 Plus Costs & \$47,972 Offer), Ret, 11/13/25
36. Letter of Zelenka to Former Counsel October 13, 2025 Filed, Ret, 11/13/25

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

s/Adele J. Pope

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March 4, 2026