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Aug 14 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Courtney Clyburn Pope, Circuit Court Judge
Case No. 2013-CP-02-1337

Appellate Case No. 2026-000330

Adele J. Pope, Appellant,

v.

Estate of James Brown and The James Brown 2000
Irrevocable Trust, Respondents.

**RETURN TO APPELLANT’S MOTION FOR EXTENSION TO FILE
RECORD ON APPEAL AND FOR RELATED RELIEF**

Respondents, the Estate of James Brown and the James Brown 2000 Irrevocable Trust (collectively, “the Estate”), respectfully submit this Return to Appellant Adele Pope’s Motion for Extension to File Record on Appeal and Related Relief (the “Motion”).

The Motion seeks four items of relief:

Appellant respectfully moves this Court for an extension of the thirty (30) days after the original due date to file the record on appeal in this matter; approval of the Court to reduce the record on appeal (ROA); approval of presenting clean copies of documents illegible within public record; and to confirm correct designations and delivery of the ROA to Respondents’ counsel.

(Motion at 1.) The Estate responds as follows to each item of requested relief.

1. Additional 30 days to file Record on Appeal (“ROA”)

The Estate does not oppose Ms. Pope’s request for a single, 30-day extension of time to file ROA.

2. Approval of the Court to reduce the ROA

It is for this Court, not the Estate, to determine whether Ms. Pope’s contemplated actions comply with the South Carolina Appellate Court Rules. The Estate’s position regarding the contents of the ROA – which has repeatedly been made clear to Ms. Pope – is that the Estate will not move to strike the ROA so long as it contains all of the materials designated by the Estate and all of the materials that are properly designated by Ms. Pope and are actually cited in her briefs.¹

3. Replacement of pages

Ms. Pope also states that “a small number of pages, (approximately 3) pulled from the public record are not legible, or [are] difficult to read.” (Motion at 2.) Ms. Pope made no mention of this issue in any of the correspondence preceding the filing of the Motion, so the Estate has no idea what documents are at issue. Accordingly, the Estate takes no position on this request.

4. Delivery of the ROA

Ms. Pope asks permission to deliver the ROA only to Ms. Small at Maynard

¹ To be clear, the Estate maintains that many of the arguments and associated designated materials are irrelevant to any matter actually on appeal and should not be considered by the Court of Appeals.

Nexsen's Columbia office and to know the current, correct addresses for the Estate's counsel. With respect to the first request, the Estate prefers electronic (email) service of the ROA and all briefs. In the alternative, a paper copy may be served on Mr. Black at the Columbia office of Baker Donelson (the address of which is below and is also in the AIS system).

With respect to the second request, and for the avoidance of doubt, the following are counsel of record for the Estate in this appeal (Appellate Case No. 2026-000330):

Kirsten E. Small, SC Bar No. 75681
Maynard Nexsen PC
1230 Main Street, Suite 700
Columbia, SC 29201
Ksmall@maynardnexsen.com
(864) 370-2211

J. David Black, SC Bar No. 68499
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
1501 Main Street, Suite 300
Columbia, SC 29201
jdblack@bakerdonelson.com
(803) 251-8818

Respectfully submitted,

s/ Kirsten E. Amall

Kirsten E. Small, SC Bar No. 75681

MAYNARD NEXSEN, PC

1230 Main Street, Suite 700

Columbia, South Carolina 29201

Telephone: 864.370.2211

KSmall@maynardnexsen.com

J. David Black, SC Bar No. 68499

BAKER, DONELSON, BEARMAN, CALDWELL &
BERKOWITZ, PC

1501 Main Street, Suite 300

Columbia, SC 29201

jdblack@bakerdonelson.com

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Columbia, South Carolina

Attorneys for Respondents

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PROOF OF SERVICE

I certify that on May 12, 2026, the foregoing **Return to Appellant's Motion for Extension to File Record on Appeal and Related Relief** was served on Appellant Adele J. Pope, *pro se*, by emailing it to her at the address provided in the South Carolina Courts' AIS system, as follows:

Adele J. Pope adele@popelawfirm.com

s/ Kirsten Small
Kirsten E. Small