

STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III Circuit Court Judge

Case No. 2013-CP-02-1337

Adele J. Pope,.....Appellant,

v.

Estate of James Brown, Deceased; The James Brown 2000 Irrevocable Trust;
Russell L. Bauknight, Individually, as former *Executor de son tort*, and in every
current and former fiduciary status claimed or held as to the Estate of James
Brown and the James Brown 2000 Irrevocable Trust,.....Respondents,

AND:

Robert L. Buchanan, Jr.,.....Interested Party.

Appellant's Designation of Matter to be
Included in the Record on Appeal

ORDERS, CASE 1337

1. Form 4 Order of The Honorable Doyet A. Early, III dtd. 1/31/14;
2. Order of The Honorable Doyet A. Early, III dtd. 1/17/14;

ORDERS AND DECISIONS - OTHER CASES

1. Order of the Honorable Doyet A. Early, III, dtd. 2/7/14;
2. Order of the Honorable Sue H. Roe dtd. 10/10/13;
3. Order of the Honorable Doyet A. Early, III, dtd. 6/13/2013, Aiken County Circuit Court No. 2008-CP-02-1647, 2008-CP-02-872;
4. Order of the Honorable Doyet A. Early, III, Cases 1647, 122, 872, 322, 721, 1059, 1426, 1712, 2127, 1556, 1557, 1758, and 1759, 1647 and 1348.
5. Order of the Honorable Liz Godard, dtd. 6/13/2013
6. Order of the Honorable Sue H. Roe, dtd. 10/10/2013
7. Order of the Honorable Doyet A. Early, III dtd. 3/8/2008
8. Order of the Honorable Doyet A. Early, III, dtd. 1/8/08

PLEADINGS - CASE 1337

1. Complaint, filed 6/10/13
2. Motion to Dismiss and for sanctions of Russell L. Bauknight, Individually
3. Motion to Dismiss and for sanctions of Estate/2000 Trust (Bauknight). dtd. 7/10/13.
5. Rule 12 Motion to Dismiss or, in the alternative, for a more definite statement dtd.;
6. Supplemental Notice of Appeal, Appellate Case No. , dtd. 12/6/13, w/partial attachments
7. Motion to Dismiss Appeal for Lack of Standing, dtd. 8/16/13;

PLEADINGS – OTHER CASES

1. Petitioners return to Plaintiff-Respondents Motion to Dismiss Appeal, South Carolina Court of Appeals, Wingate Suit, dtd. 3/7/11;

2. Motion of Adele J. Pope for Expedited Relief to Protect James Brown "I Feel Good" Trust, dtd. 5/20/12
3. Motion of Adele to expedite intervention; add parties and determine Commission and Attorney Fees, Case 1426, dtd. 5/21/12;
5. Statement of "Attorney's fees and Trustees fees paid by the Estate in Relation to this Action" Pursuant of the Hon. Doyet A. Early, III and The Hon. Liz Godard, Clerk Dated June 13, 2013 (Reserving all Objections);
7. Motion and Memorandum of Adele J. Pope Pro Se to dismiss AG and Bauknight as parties and renewed motion to expedite based on May 8, 2013 decision in Wilson v. Dallas... filed SC Supreme Court appellate case No. 2012-212197 ("Hynie GAG Order Appeal");
8. Return of Adele Pope, dtd. Oct. 2013, re: GAL appointment Michael Brown, James Curtis, and Doe Defendants;
9. Reply of Adele J. Pope to Return of David C. Sojourner, Jr., dtd. 1/30/14, pp. 1, 4-17, 19, Exhibit A;
10. Letter of AG Adam L. Whitsett to Pope, dtd. 1/31/14 re: FOIA Response - request for Sonny Jones/Forlando Brown/ROFR/2011 w/Response (partial);
11. Motion to Reconsider, Vacate, Alter or Amend Order dtd. October 1, 2013, dtd. 10/13/13;
12. Motion for Expediting Voiding of Claimed Appointments; Notice of Disallowance; and for other relief, dtd. 6/9/13;
13. Petition for Allowance of Claim of Albert H. Dallas;

TRANSCRIPTS

1. Hearing held December 21, 2007, pp. 1, 25-26, 31, 50-58, 61, 65;
2. Hearing held August 19, 2008, pp. 1, 9-12, 16, 20, 22, 23, 26, 27
3. Hearing held October 25, 2008 pp. 1, 10-17, 18-33, 35-39, 41-42, 48-49, 51,53-54, 58-67, 70-71, 74-75, 84-85, 88-90, 92.
4. Hearing held Sept. 9, 2009, Case 1647, pp. 29, 33;

5. Hearing August 30, 2010, pp. 1, 20, 22 (?), 42, 44, 45; [with emphasis];
6. Status Conference held April 13, 2012, Forlando Brown v. Adele J. Pope, et. al. pp. 1, 2, 6, 7, 14, 15;
7. Hearing held May 22, 2012, pp. 1, 25, 34-36, 41-45, 59;
8. Hearing held July 2, 2013, pp 1, 3-9, 31, 42 (line 16) - 47 (line9), 56-70, 73 (line 14) - 78,
9. Hearing held July 9, 2013, pp. 1-17, 22, 23, 27-30, 33 (line 9) - 34 (line 5);
10. Hearing held December 3, 2013, pp. 1, 6 (line 13) - 8, 15 (line 9) - 24 (line 11), 28 (line 16) - 30;

AFFIDAVITS AND OTHER

1. Email of A. Peter Shahid, Jr. to Sonny Jones and Others, dtd. 2/15/08;
2. Ltr. of AG McMaster to Buchanan and Pope, dtd. 7/30/08;
3. Ltr. of Levenson to the Honorable Doyet A. Early, dtd. 7/30/08 re: DNA testing;
4. Joint Claim, Affidavit and Supporting Documentation of Buchanan & Pope (Partial)
5. Menell, Peter S. and Nimmer, David, "*Pooh-Poohing Copyright Law's 'Inalienable' Termination Rights*", 2010 (Partial);
6. Affidavit of Default of Defendants, Bauknight and Others AND Henry Dargan McMaster in his capacity as Attorney General of South Carolina and Others v. Pope and Buchanan, dtd. 11/10/10, Wingate Suit;
7. Pope, A. & Smith, , *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown "I Feel Good" Trust doesn't...*, April 2011 (Draft)
8. Email of Pope to Nosal, dtd. 6/22/12 re: Dr. Udom;
9. Ltr. of Pope to AG Alan Wilson, dtd. 11/29/12;
10. Email of Pope to Rosen, dtd. May 11, 2013;

11. Ltr. of James Curtis dtd. June 9, 2012
13. Ltr. of the Honorable Henry McMaster dtd. 7/30/08
14. Ltr. of Estate/2000 Trust to AG Master dtd. 6/23/08
15. Email of Medlin to Rosen re: "Adolph [sic]" 7/08
16. Email of The Honorable Doyet A. Early, III, dtd. May 14, 2013 re: Hearing to set new PR;
17. Email of The Honorable Doyet A. Early, III, dtd. May 15, 2013 re: status conference;
18. Ltr. of Pope and AG Alan Wilson, dtd. Sept. 16, 2013;
19. Email of Pope to AG (AG Cook and Others) re: request for resignation of Russell Bauknight, dtd. 11/22/13;
20. Ltr. of Pope to the Honorable Jenny Abbott Kitchings dtd. 12/12/13 re: Appellate case No. 2013-002582
21. Portion, Exhibits March 2012, State v. Cannon, Payments to David G. Cannon 1999-2006 tracing of Pullman bond funds to David Cannon 1999-2003, Victim Impact Statement of Russell Bauknight;
22. Email of Pope to William James Brown and Matt Bodman, Esquire, dtd. 4/15/13
23. Ltr. of John F. Beach, Esquire to The Honorable Doyet A. Early, dtd. 1/6/14
24. Ltr. of Pope to Wilson, 1/3/14 w/attachments;
25. Ltr. of Rosen to The Honorable Doyet A. Early, III dtd. 1/6/14;
26. Ltr. of Pope to the Honorable Doyet A. Early, III dtd. 1/17/14;
27. Ltr. of Pope to The Honorable Liz Godard, dtd. 1/17/14 re: Ex Parte: Doe Defendants No. I, II, III, IV, and Others, interveners in the matter of petition of Tommie Rae Hynie a/k/a James B. Brown, Minor
28. Ltr. of William Newsome, III to Pope, dtd. 2/3/14 re: Dallas/Estate of James Brown;

29. Motion of Adele J. Pope to Alter or Amend and/or Reconsider and Vacate Order dtd. 1/7/14 dismissing claims under Rule 12(b)
30. Email of Pope to David B. Bell, Esquire and Matthew Bodman, Esquire dtd. 5/22/13, re: Saving the James Brown "I Feel Good" Private Foundation;
31. Email of Pope to John McIntosh, Bob Cook and Sonny Jones, dtd. 5/23/12 re: request for inquiry James Brown "I Feel Good" Charitable Trust;
32. Email chain among Pope and Others and Adam C. Ness, Esquire Law Clerk to Judge Early dtd. May 9, 2013 - May 15, 2013;
33. Emails to and from Terry Bradford Cox Ph.D to Sonny Jones, Esquire, dtd. 1/7/11, 1/17/11 and 1/18/11;
34. Email from Levenson and Associates to Sonny Jones and Others, dtd. 5/12/13;
36. Emails to and from David Black, Esquire to AG Mary Frances Jowers, dtd. June 4-5, 2013 re: DNA protocol;
37. Email of AG Sonny Jones to AG J.C. Nicholson, AG Mary Frances Jowers, AG Patricia Simmons, AG Sandra Matthews re: Order consolidating cases and ordering DNA test and Scheduling Order;
38. Email of Alan Medlin, Esquire to Robert Rosen, Esquire, dtd. 7/30/08; re: Adolph (sic);
39. Ltr. of Pope to AJK@ByrdLawGroup.com dtd. 5/25/13 re: Saving the James Brown "I Feel Good" Private Foundation;
40. Email of Pope to Louis Levenson, Esquire, dtd. 11/5/12;
41. Email of Pope to Louis Levenson, Esquire, dtd. 10/24/12;
42. Email of Pope to Deanna J. Brown Thomas dtd. 5/24/13 re: request for support/nomination probate of 1999 Will
43. Affidavit of Adele J. Pope in Support of Petition for Writ of Prohibition and in Support of Reply to Returns to Petition for Writ of Prohibition and Return to Motion to Dismiss Petition;

44. Email of William James ("Forlando") Brown to Pope, dtd. 3/21/13 re: Saving the James Brown "I Feel Good" Foundation and earlier email of Pope to Brown;
45. Email of William James ("Forlando") to Mr. Wingate, dtd. 4/15/13 re: Terry Brown representation;
46. Email of Pope to F. Kingsmore, Esquire, AG Mary Frances Jowers and others dtd. 5/10/13 re: request for consent of dismissal of Parties - expedited appeal - Hynie GAG orders;
47. Email of Pope to Albert H. Dallas 5/24/13 re: Saving James Brown "I Feel Good" Trust/1999 Will as backup;
48. Email of Pope to Judge Early, dtd. 7/2/13 re: Request for documents ordered to be delivered on March 15, 2010;
49. Email of Pope to Sherri Lydon, Esquire, dtd. 7/2/13 and response;
50. Affidavit of Adele J. Pope in Support of Voiding Orders dated June 13, 2013, dtd. 7/3/13;
51. Ltr. of Pope to Frederick A. Crawford, Esquire, dtd. 7/11/13;
52. Ltr. of Buchanan to The Honorable Doyet A. Early, III, dtd. 7/26/13;
53. Ltr. of Marc Toberoff to Warner Music, Sept. 2013, re: Tomi Rae Terminations;
54. Vincent, Christine J. "*the artist as philanthropist...*", study report supplement, 2013 (partial);
55. Email of Pope to Beach, dtd. 1/3/14;
56. Supplemental Affidavit of Adele J. Pope Supporting Expedited Hearing; Order Voiding Hynie "Diary" Gag Orders; and Orders Directing DNA Testing Under Peeples DNA Protocol for James B., Michael (Incarcerated), and Others and Related Relief, dtd. 1/17/14;
57. "Warner Bros Wins Superman Copyright Battle As Heirs Denied Rehearing", Deadline/Hollywood, Patten, Dominic, January 21, 2014;
58. Forbes, Top Earning Dead Celebrities, 2007

59. Accounting Today, IRS Disputed Value of Michael Jackson Estate, 2/10/2014
60. Affidavit of Pope supporting ruling on full commission on Record or holding all except current judgment in abeyance pending appeal; (partial)
61. Website of AG Wilson, list of pending litigation retention agreements of AG;
63. Defendant Adele J. Pope's Brief of Support of Injunction as to Russell L. Bauknight and Sweeny, Wingate and Barrow (partial);
64. Nine ways to avoid Copyright Terminations, Part I, II

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

Respectfully submitted,



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Pro Se

February 11, 2014

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AND:

Robert L. Buchanan, Jr.,..... Interested Party.

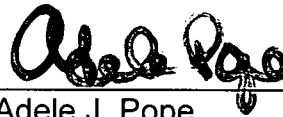
PROOF OF SERVICE

I certify that on the 11th day of February, 2014 I served the DESIGNATION
OF MATTTTER TO BE INCLUDED IN THE RECORD OF APPEAL on Respondents
and on the Interested Person as shown below by depositing a copy of same in the
United States Mail, postage prepaid to them or their attorneys of record as follows:

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