

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 21 2014  
SC Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge  
The Honorable Liz Godard, Clerk of Court

Appellate Case No. 2013-00169

Alan Wilson, in his Capacity as Attorney General of  
South Carolina; and others ..... Plaintiffs,

v.

Albert H. Dallas and others .. Defendants.

OF WHOM:

Adele J. Pope, Individually and on Behalf of Others under South Carolina Trust  
Code Section 62-7-405, is.....Appellant,

AND:

Terry Brown, Forlando Brown, James B., David G. Cannon, Albert H. Dallas and  
Tommie Rae Hynie are.....Respondents

AND:

Alan Wilson in his Capacity as Attorney General of South Carolina, Deanna J.  
Brown Thomas and Robert L. Buchanan, Jr., are...Additional Interested Persons.

IN RE:

The Estate of James Brown and The James Brown 2000 Irrevocable Trust  
u/a/d August 1, 2000

Adele J. Pope  
1228 Walnut Street  
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(803) 413-0753  
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SC Bar #4501

Appellant, *pro se*

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

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**ORDERS - CASE 1647**

1. Form 4 Order of the Honorable Doyet A. Early, III dated 1/31/14 and filed 2/4/14, Aiken County Circuit Court No. 2013-CP-02-1337 ("Case 1337");
2. Order of the Honorable Doyet A. Early, III dated 1/7/14, filed 1/17/14, Case 1337;
3. Order of the Honorable Doyet A. Early, III dated 10/1/13, Aiken County Case No. 2008-CP-02-1647 ("Case 1647") and Other Cases;
4. Order of the Honorable Doyet A. Early, III dated 10/25/13, Case 1647 and Other Cases;
5. Order of the Honorable Doyet A. Early, III dated 6/13/13, Case 1647 and Other Cases;
6. Order of the Honorable Doyet A. Early, III, dated 6/13/13, Case 1647 and Other Cases;
7. Order of the Honorable Liz Godard, Clerk of Court dated 6/13/13, Case 1647 and Other Cases;
8. Order of the Honorable Doyet A. Early, III dated 7/10/13, Case 1647 and Other Cases.

**ORDERS - OTHER**

1. Order of the Honorable Doyet A. Early, III, dtd. 2/7/14;
2. *Ex parte* Order of the Honorable Sue H. Roe dtd. 10/10/13;
3. Order of the Honorable Doyet A. Early, III, dtd. 4/8/08;
4. Order of the Honorable Doyet A. Early, III dtd. 3/8/2008;
5. Order of the Honorable Doyet A. Early, III, dtd. 1/8/08;

## ORDERS - OTHER CASES

1. Order of the Honorable Frank R. Addy, Jr., dtd. 11/22/11, *Pope vs. Wilson*, Case No. 2011-CP-36-0379;
2. Order of the Honorable Frank r. Addy, Jr., dtd. 1/11/12, *Pope vs. Wilson, et al*, Case No. 2011-CP-36-0364;

## PLEADINGS

1. Motion to Alter, Amend and Vacate Orders Dismissing Heirs of James Brown and Others from Proceedings of James B. and Tommie Rae Hynie, dtd. 2/14/14;
2. Russell L. Bauknight's Petition for Rehearing Pursuant to Rule 221(a), SCACR, dtd. 3/12/13, Case 1647;
3. Supplemental Response to Motion/memorandum of Deanna Brown Thomas and Others and Request for Appointment as Guardian Ad Litem for Michael D. Brown and for Related Relief, dtd. 11/18/13, Case 1647 and Other Cases;
4. Memorandum Related to Appealability, dtd. 12/17/13, Case 1647 and Other Cases;
5. Motion to Alter or Amend and/or Reconsider and Vacate Order Dated January 7, 2014 Dismissing Claims Under Rule 12(b);
6. Motion to be Relieved as Counsel of James Griffin, dtd. 6/4/13;

## PLEADINGS - OTHER CASES

1. Complaint, *Bauknight, et al, vs. Pope and Buchanan*, Case No. 2010-GC-40-00073 (Partial), dtd. 5/19/10;
2. Memorandum in Opposition to Motion to Dismiss, *Bauknight, et al, vs. Pope and Buchanan*, Case No. 2010-CP-40-4900 (Partial), dtd. 8/27/10;
3. Status Report, *Brown v. Pope, et al*, Case No. 3:08-cv-00014-WOB, dtd 5/18/11
4. Complaint, *Pope v. Wilson, et al*, Case No. 2011-CP-36-0364, dtd. 8/3/11 (Partial);

5. Complaint, *Pope v. Wilson, et al*, Case No. 2011-CP-36-0379, dtd. 8/10/11 (Partial);
6. Return to Motion to Compel Settlement, *Bauknight, et al, vs. Pope*, dtd. 7/24/2012;
7. Appellant's Brief, *In re Estate of James Brown (Pope v. Wilson)*, dtd. 8/15/12 (Partial)
8. Returns, Motions, *In re Estate of James Brown (Pope v. Wilson)* (Partial)
9. Motion to be Relieved as Counsel, *Bauknight, et al, vs. Pope and Buchanan*, Case No. 2010-GC-40-4900 (Partial), dtd. 3/2013
10. Complaint, *Pope vs. Bauknight, et al*, Case No. 2013-CP-02-1337, dtd. 6/10/13 (Partial);

#### **TRANSCRIPTS**

1. Transcript of 9/7/09 Hearing, *McMaster v. Dallas*, pp. 1, 11-20;
2. Transcript of 8/30/10 Hearing, *Bauknight v. Pope* (Partial);
3. Transcript of 4/13/11 Hearing, *Brown v. Pope*, pp. 1, 3, 46;
4. Transcript of 7/9/13 Hearing, various Aiken cases (Partial);

#### **AFFIDAVITS AND OTHERS**

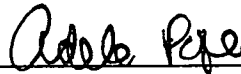
1. Responses to Motion to Reconsider of Bauknight, including chronology;
2. Letter of John F. Beach to the Honorable Doyet A. Early, III, 1/6/14;
3. Affidavit of Adele J. Pope in Support of Memorandum Related to Appealability, dtd. 12/17/13, Case 1647 and Other Cases;
4. Letter of Marc Toberoff to Warner Chappell Music, dtd. 9/2013;
5. Email of The Honorable Doyet A. Early, III to Adele Pope, dtd. 7/10/13;
6. Letter of Robert L. Buchanan, Jr. to the Honorable Doyet A. Early, III dtd. 7/2013;
7. Notice of Disallowance of Creditor's Claim, dtd. 5/29/13;

8. Email of the Honorable Doyet A. Early, III, dtd. 5/17/13;
9. Letter from Adele J. Pope to Attorney General Alan Wilson, dtd. 5/17/13;
10. Adele J. Pope's Motion for Expedited Relief, Case No. 2008-CP-02-0872, dtd. 5/13/13;
11. Adele J. Pope's Motion to Expedite, Case No. 2008-CP-02-1426, dtd. 5/13/13;
12. Adele J. Pope's Motion for Scheduling Order;
13. Accounting, Estate of James Brown, dtd. 5/4/13;
14. Letter of Sweeney, Wingate and Barrow to the Honorable L. Casey Manning, dtd. 4/18/13;
15. Affidavit of Russell L. Bauknight, dtd. 3/14/13, Case 1647;
16. Ltr. of Adam T. Silvernail, Esquire to The Honorable L. Casey Manning, dtd. 3/15/13;
17. The Aspen Institute (supp. 2013). *The artist as philanthropist. strengthening the next generation of artist-endowed foundations*;
18. Sworn Statement of Albert H. Dallas, 7/20/12 (Partial)
19. Letter of James Curtis, dtd. 6/2012
20. Pope, A.J. and Smith, W.J. (2011). *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown "I Feel Good" Trust doesn't....* Unpublished manuscript;
21. Tape, Supreme Court oral argument, *Wilson v. Dallas*, 11/1/11;
21. Amended Inventory and Appraisal, Estate of James Brown, dtd. 5/4/11 (Partial);
22. Wingate Litigation Retention Agreement dtd. 5/19/10 (Partial);
23. Statement of Creditors' Claim of Robert L. Buchanan, Jr. and Adele J. Pope dtd., Ex. 5, 11, 12;
24. Letter from David B. Bell to Robert L. Buchanan, Jr., dtd. 3/09

25. Notes of Robert L. Buchanan, Jr., dtd. 1/31/09;
26. Email from S. Alan Medlin to Robert N. Rosen, dtd. 7/14/08;
27. Letter from Robert L. Buchanan, Jr. and Adele J. Pope to the Honorable Henry D. McMaster dtd. 6/13/08
28. Summer, Sue. "Papa's Got a Brand New Son"
29. Last Will and Testament of James Brown, dtd. 8/1/00 (Partial)
30. James Brown Irrevocable Trust Agreement, dtd. 8/1/00 (Partial)
31. Last Will and Testament of James Brown, dtd. 6/15/99 (Partial)
32. James Brown Tape, 2/24/99;

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

Respectfully submitted,



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*Pro Se*

February 21, 2014

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PROOF OF SERVICE

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I certify that on the 21<sup>th</sup> day of February, 2014, I have served the

DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL on Respondents and/or others as shown below by depositing a copy of same in the United States Mail, postage prepaid, addressed to their attorneys of record as follows:

David B. Bell, Esquire  
Matthew D. Bodman, Esquire  
619 Greene Street  
Post Office Box 1011  
Augusta, Georgia 30903-1101

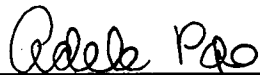
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