

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

---

Appellate Case No. 2014-00250

---

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.

---

PROOF OF SERVICE

---

I certify that on the 21st day of March, 2014 I served the RETURN AND  
OPPOSITION OF APPELLANT TO MOTION TO DISMISS on Respondents  
and the Interested Party 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:

William Newsome, Esquire  
J. David Black, Esquire  
William Wilkins, Esquire  
Nexsen Pruet  
1230 Main Street, Suite 700

RECEIVED

MAR 21 2014

SC Court of Appeals

P.O. Box 2426  
Columbia, South Carolina, 29202-2426

Frederick Crawford, Esquire  
Richardson, Plowden  
PO Box 7788  
Columbia, South Carolina 29202

Robert L. Buchanan, Jr.  
212 Newberry St., NW  
Post Office Box 463  
Aiken, South Carolina 29802



---

Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108  
Telephone: 803-413-0753  
Email: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)  
S.C. Bar No. 4501  
*Pro Se*

March 21, 2014

**Law Office of Adele J. Pope, P.C.**  
**1228 Walnut Street**  
**Newberry, South Carolina 29108**  
**803-413-0753**

March 21, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Pope vs. Estate of James Brown and others  
Appellate Case No. 2014-00250

Dear Ms. Kitchings:

In connection with the above-referenced appeal, enclosed please find an original and seven copies of the following:

1. Return and Opposition of Appellant to Motion to Dismiss; and
2. Proof of Deliver of the above.

Kindly file the original and copies, and return a file-stamped copy of each with the person who delivers this letter.

Thank you.

Yours very truly,



Adele J. Pope  
Appellant, *Pro Se*

cc:

Counsel and Parties as shown on Proof of Delivery

**RECEIVED**

MAR 21 2014

**SC Court of Appeals**