

Exhibit G

Exhibit G

STATE OF SOUTH CAROLINA)	IN THE PROBATE COURT
)	
COUNTY OF AIKEN)	
)	
Adele J. Pope,)	Estate File No. 2007-ES-02-0056
)	
Plaintiff,)	
)	
v.)	
)	
Estate of James, Brown, Deceased et al.)	Motion for Expedited Voiding
)	Of Claimed Appointments;
Defendants.)	Notice of Disallowance; and
AND:)	Appointment of SA/ST, Including
)	Emergency Appointment of SA/ST
Robert L. Buchanan, Jr.,)	For Litigation to Accept Service
Interested Party.)	And Prevent Further Loss by
)	Bauknight

TO RUSSELL L. BAUKNIGHT, ALL DEFENDANTS AND INTERESTED PARTY:

YOU WILL PLEASE TAKE NOTICE that Plaintiff, as soon as she may be heard will move before the Court at the Aiken County Courthouse located at 109 Park Avenue SE, Aiken, South Carolina pursuant to for an Emergency Order as follows:

1. Voiding any SA/ST Appointments granted to Russell L. Bauknight ("Russell")
2. Appointing an SA/ST for the Estate of James Brown and the James Brown 2000 Irrevocable Trust (the "Estate/2000 Trust") who:
 - a. Is not connected in business with any current or former fiduciary;
 - b. Will have the time and accept the appointment for \$300 per hour, and costs to vigorously defend the Will of James Brown, the Estate and the 2000 Trust in pending litigation which must be completed or progress for this Court to comply with the mandate of *Wilson v. Dallas*.
 - c. To be paid from the Estate of James Brown/2000 Trust by direction of the Court, including all costs on an ongoing basis;
 - d. To accept service of, and defend this Action;

- e. To appear and represent the Will/2000 Trust and Estate of James Brown in Case 4900 in light of *Wilson v. Dallas*;
- f. To appear and represent the 2000 Trust in the Forlando Federal Suit;
- g. To appear and represent the Estate/Will/2000 Trust in all FOIA matters;
- h. To appear and represent the Estate/Will/2000 Trust in preparing Case 872 for Trial, including correction of parties; DNA testing; discovery; and all other matters.
- i. To represent the Will/Estate/2000 Trust in all other litigation as necessary.
- l. To do so without regard to the position taken by Russell in any litigation pending during the *Wilson v. Dallas* appeal.
- j. To report to this Court no later than 150 days from his appointment, or earlier if needed, as to his progress in the protection of the Will and 2000 Trust.

3. Directing that Russell, Plaintiff, Buchanan and all current and former fiduciaries and their counsel who have received or seek payments from the Estate and/or 2000 Trust or any Brown Entity make all files available to the SA/ST and forthwith deliver to him such original files as he requests, for safekeeping, with such party to have continuing access.

4. Requiring Bauknight to produce to Plaintiff and all others all information to support his less-than \$4.7 Million at-death value, and to account for his actions through May 8, 2013 within 30-days and to:

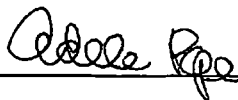
- a. Take no action which will, or might be construed to, aid any person who has challenged the Will or 2000 Trust; and
- b. Show cause at that hearing why he should not be permanently removed from any fiduciary position based on his irreconcilable loyalty to Tommie Rae and fiduciary relationship with Terry/Forlando and others.

The grounds of this motion are:

1. Every fact stated in the Complaint which the action of Russell required Plaintiff to file, on information and belief, to circumvent the mandate of *Wilson v. Dallas*, and which is incorporated herein by reference;
2. Russell's false statements and positions have placed the Estate/2000 Trust in immediate jeopardy in defending the baseless claims of those challenging the Will and 2000 Trust, including:
 - a. That Tommie Rae's claim for elective share is a "slam dunk."
 - b. That Jeanette, Lisa, Nicole and La Rhonda are not heirs of James Brown.
 - c. That Brown's worldwide music empire was worth less than \$4.7 Million when he died.
 - d. That it was the Attorney General's fault that he did not seek restitution against Cannon or make any effort to secure his million-dollar retirement home.
 - e. That Bob Buchanan and Adele Pope committed the federal felony of intentionally overstating Brown's assets by \$79 Million – more than 15 times their value – for the improper purpose of obtaining a \$5 Million commission.
3. Russell has failed to protect the minor beneficiaries of the 2000 Trust, making them Plaintiffs in Case 4900 and then refusing to have a GAL appointed.
4. Russell has failed to protect the incarcerated Venisha, naming her as a Plaintiff in case 4900; seeking mediation on her behalf; then asserting she did not need a GAL for the mediation.
5. Russell has damaged the Estate/2000 Trust by failing to recover the Trust's costs for the 5-year-old frivolous Forlando Federal Suit; hiring Forlando's lawyers with Estate/2000 Trust funds; and secretly working on a transfer of the interest of Terry to Forlando – which was then concealed from the State and Federal Courts.

The above motion is based on the Complaint herein and the Affidavit of Adele Pope filed herewith, as well as the S.C. Rules of Civil Procedure, the South Carolina Probate Code, the South Carolina Trust Code, applicable case and statutory law, and such additional documentation as shall properly come before the Court prior to the

hearing on this matter.



Adele J. Pope, *Pro Se*
1228 Walnut Street
Newberry, South Carolina 29108
803-413-0753
adele@popelawfirm.com
S.C.Bar No. 4501

June 9, 2013