

Exhibit E

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MAY 13 2014

SC Court of Appeals

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

RUSSELL L. BAUKNIGHT, as Trustee of the James Brown 2000 Irrevocable Trust and the James Brown Legacy Trust, as Personal Representative of the Estate of James Brown, and on behalf of Alan Wilson, in his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James Brown II; Daryl J. Brown, individually and on behalf of his minor child Janise Vanisha Brown; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor children Sydney Lumar and Carrington Lumar; Tonya Brown; Venisha Brown Larry Brown; and Terry Brown

and

ALAN WILSON, in his capacity as Attorney General of the State of South Carolina; TOMMIE RAE BROWN, individually and on behalf of her minor child, JAMES BROWN II; DARYL J. BROWN, individually and on behalf of his minor child JANISE VANISHA BROWN; LINDSEY DELORES BROWN; DEANNA J. BROWN THOMAS; JASON BROWN-LEWIS; YAMMA N. BROWN, individually and on behalf of her minor children SYDNEY LUMAR and CARRINGTON LUMAR; TONYA BROWN; VENISHA BROWN; LARRY BROWN; and TERRY BROWN,

Plaintiffs

v.

Adele J. Pope,

Defendant

IN THE COURT OF COMMON PLEAS

FOR THE FIFTH CIRCUIT

Civil Action No. 2010-CP-40-4900

MOTION TO STAY

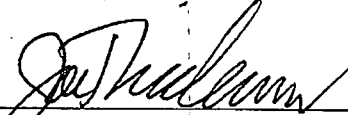
YOU WILL PLEASE TAKE NOTICE the undersigned, as attorneys for the Plaintiffs, will move before the presiding Judge of the Richland County Circuit Court, at the Richland County Courthouse on the tenth (10th) day after service hereof, or as soon thereafter as counsel may be heard, for an Order granting a stay of the case.

The grounds for the motion are that, subsequent to the South Carolina Supreme Court's decision in Wilson v. Dallas, 403 S.C. 411, 743 S.E.2d 746 (2013), substantial uncertainty remains with respect to the composition of the plaintiffs' group, the potential for conflicts among the group members, and the capacity in which Sweeny, Wingate & Barrow, PA will be able to continue representing the group. These issues will not be resolved until the various Aiken County will contests that were revived by Wilson v. Dallas are resolved with finality.

Plaintiffs request that the Court stay this matter until such time as the various Aiken County will contests are resolved with finality.

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.



Kenneth B. Wingate
Mark V. Gende
Joseph O. Thickens
Sweeny, Wingate, & Barrow, P.A.
Post Office Box 12129
Columbia SC 29211
(803) 256-2233

ATTORNEYS FOR PLAINTIFFS

Columbia, South Carolina

April 22, 2014