

# Exhibit G

**RECEIVED**

MAY 13 2014

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

COUNTY OF NEWBERRY

Susan D. Summer

Plaintiff,

v.

Alan Wilson, In His Capacity As  
Attorney General for the State of South  
Carolina

Defendant.

) THE COURT OF COMMON PLEAS

) FOR THE EIGHTH JUDICIAL CIRCUIT

) Civil Action No.: 2012-CP-36-00688

) MOTION TO INTERVENE OF  
) RUSSELL L. BAUKNIGHT, AS TRUSTEE  
) OF THE JAMES BROWN 2000  
) IRREVOCABLE TRUST AND AS  
) PERSONAL REPRESENTATIVE OF THE  
) ESTATE OF JAMES BROWN

TO THE PARTIES ABOVE-NAMED:

YOU WILL PLEASE TAKE NOTICE that Pursuant to Rule 24 of the South Carolina Rules of Civil Procedure, and upon the tenth day after service hereof, or as soon thereafter as counsel may be heard, Russell L. Bauknight, as Trustee of the James Brown 2000 Irrevocable Trust and as Personal Representative of the Estate of James Brown (the "Trust and Estate"), plans to move before the Court, and does hereby so move, for an Order allowing intervention in this matter as a Defendant.

This Motion is based upon the fact that a fee agreement, or portion thereof, concerning Richland County Case No. 2010-CP-40-4900 ("Richland County Case 4900") (to which the Estate and Trust is a party) is the subject of the instant dispute and that intervention is proper for, *inter alia*, the following reasons:

First, Proposed-Intervenor asserts the fee agreement is privileged and not subject to the South Carolina Freedom of Information Act (FOIA).

Second, Proposed-Intervenor asserts that the fee agreement is the subject of a pending discovery motion before The Honorable Casey L. Manning in Richland County Case 4900, the outcome of which will establish the status of the fee agreement as privileged or discoverable. Therefore, any decision made by this Court before Judge Manning rules on the pending discovery motion would be premature and create the potential for conflicting rulings between this Court and Judge Manning.

Third, Proposed-Intervenor is informed and believes that the instant FOIA action has been undertaken by an alter ego for the Richland County Case 4900 Defendant Mrs. Adele Pope, who previously filed her own Newberry FOIA action for the same documents, Newberry County Case No. 2011-CP-36-00379. The Honorable Frank R. Addy, Jr., after hearing various motions, consolidated, but did not merge, Mrs. Pope's Newberry FOIA action with Richland County Case 4900. Pope's FOIA action is now pending before Judge Manning. Proposed-Intervenor asserts the instant case should also be consolidated with Richland Case 4900 and heard by Judge Manning.

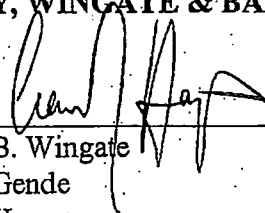
Proposed-Intervenor affirmatively states that he is seeking intervention only to protect the Estate and Trust's interest in a document he believes to be privileged and is currently subject to review by another circuit court judge. Proposed Intervenor's motion on behalf of the Estate and Trust, or any subsequent intervention, is not a waiver of the Estate and Trust's statutory exclusion from any FOIA actions directed against it and is not intended to subject the Estate or Trust to jurisdiction in any FOIA action directed against it.

This Motion may be further supplemented by a Memorandum of Law, by Affidavits, or by any other information as may be fit and proper.

*Signature Page Immediately Following*

Respectfully Submitted,

**SWEENEY, WINGATE & BARROW, P.A.**



---

Kenneth B. Wingate  
Mark V. Gende  
Aaron J. Hayes  
1515 Lady Street  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803) 256-2233

**ATTORNEYS FOR PROPOSED-  
INTERVENOR**

Columbia, South Carolina

April 16, 2013