

STATE OF SOUTH CAROLINA

In the Court of Appeals

72643

APPEAL FROM AIKEN COUNTY
Court of Common Pleas
The Honorable Doyet A. Early, III, Circuit Court Judge

Appellate No.: 2014-00250
Civil Action No.: 2013-CP-02-1337

Adele J. PopeAppellant

vs.

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
a former fiduciary status claimed or held as the Estate of James Brown
2000 irrevocable trust.Respondents.

And Robert L. Buchanan, Jr., interested party

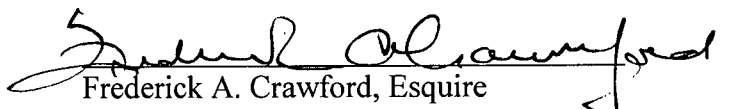
**MOTION TO STRIKE
ON BEHALF OF RUSSELL L. BAUKNIGHT,
INDIVIDUALLY**

Russell L. Bauknight, individually, improperly captioned as a Respondent¹ in this matter,
hereby moves to strike portions of Appellant, Adele J. Pope's, Supplemental Return and
Memorandum in Opposition of the Letter Motion of Russell L. Bauknight, Individually. The

¹ Russell Bauknight is aware of Ms. Pope's attempt to file a Supplemental Notice of Appeal which, depending on the Court's acceptance or denial of such an amendment, could change this characterization.

grounds for this Motion are set forth in the accompanying Memorandum of Law pursuant to Rule 240(c)(2), SCACR.

Respectfully submitted,



Frederick A. Crawford, Esquire
RICHARDSON PLOWDEN & ROBINSON, P.A.
1900 Barnwell Street (29201)
P.O. Drawer 7788
Columbia, South Carolina 29202
803-771-4400

COUNSEL FOR RUSSELL L. BAUKNIGHT, INDIVIDUALLY

June 25, 2014

STATE OF SOUTH CAROLINA

In the Court of Appeals

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JUN 25 2014

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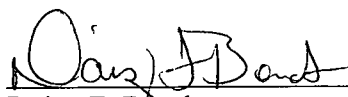
And Robert L. Buchanan, Jr., interested party

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A.,
attorneys for Respondent Russell L. Bauknight, individually, do hereby certify that I
have this date served the foregoing Motion to Strike on behalf of Russell L. Bauknight,
individually by personally depositing a copy of the same in a United States Postal
Service mailbox, postage prepaid, addressed to the following:

Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108

William Newsome, Esquire
J. David Black, Esquire
Nexsen Pruet
1230 Main Street, Suite 700
Post Office Box 2426
Columbia, South Carolina 29202-2426


Daisy F. Bonds

Dated: June 25, 2014

June 25, 2014

Columbia
fcrawford@richardsonplowden.com
Direct Dial: 803-576-3711

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: *Adele J. Pope v. Estate of James Brown, et al.*
Civil Action No.: 2013 –CP-02-1337
Appellate Case No.: 2014-000250
Our File No.: 101-2606

Dear Ms. Kitchings:

As counsel for improperly designated Respondent, Russell L. Bauknight, individually, I have enclosed for filing an original and six copies of our Motion to Strike and original Certificate of Service. I have also enclosed an additional copy of our Motion and Memorandum and would request that it be file stamped and retruned with our courier. Also, enclosed please find a check for a \$25.00 filing fee.

We are this day serving a copy of our Motion to Strike on the *pro se* Appellant.

Thank you in advance for your assistance, I am,

Sincerely,


Frederick A. Crawford

FAC/smb

Enclosures

cc: Adele J. Pope, Esquire
William G. Newsome, III

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JUN 25 2014
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