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SC Court of Appeals

**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. 2013-001649

Alan Wilson, in his Capacity as Attorney General of South Carolina; and others, Plaintiffs,

v.

Albert H. Dallas and others, Defendants,

Of whom Adele J. Pope, Individually and on behalf of Others under South Carolina Trust Code Section 62-7-405, is.....Appellant,

And Terry Brown, Forlando Brown, James B., David G. Cannon, Albert H. Dallas and Tommie Rae Hynie are.....Respondents

And Alan Wilson in his Capacity as Attorney General of South Carolina, Deanna J. Brown Thomas and Robert L. Buchanan, Jr., are..... Additional Interested Persons.

In Re: The Estate of James Brown and The James Brown 2000 Irrevocable Trust u/a/d August 1, 2000, Respondents.

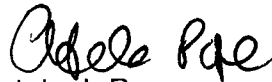
MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Pursuant to Rule 240 SCACR and other Applicable law, Appellant moves for an extension of forty-five (45) days to file her initial reply brief to the Brief of Respondent Estate of James Brown/James Brown 2000 Irrevocable Trust dated July 7, 2014. Other Respondents failed to file initial briefs.

Appellant requests the extension based on her personal and professional schedules which include, but are not limited to:

- a. a personal vacation scheduled for August;
- b. An appeal related to Federal District Court Case 3:08-cv-00014-WOB related to the James Brown 2000 Irrevocable Trust in which the 2000 Trust, Appellant and Robert L. Buchanan were sued on January 2, 2008 by Respondents Forlando Brown;
- c. A Court Order issued this week in the above matter, and notice to Appellant that David Bell, Esquire and Matthew Bodman, Esquire have been terminated as counsel for Respondent Forlando Brown in all matters. [The Federal Court Order directed new counsel Scott Keniley, Esquire, to make an appearance by July 17.]
- d. Motions and Discovery in the portion of James Brown Aiken Case 2013-CP-02-1337 not subject to appeal in Appellate Case No. 2014-000250, related to the Estate's Notice of Disallowance served May 29, 2013 of Appellant's court-approved SA payment for 2007 and partial PR/Trustee commission for November 20, 2007 - May 26, 2009.
- e. Issues raised by diverse Respondents Terry Brown, Forlando Brown, James B., Cannon, Dallas and Hynie not filing initial briefs herein.

Respectfully submitted,



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

July 9, 2014

Appellant, *Pro Se*

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Persons.

In Re: The Estate of James Brown and The James Brown 2000 Irrevocable
Trust u/a/d August 1, 2000, Respondents.

PROOF OF SERVICE

I certify that on the 9th day of July, 2014, I have served the MOTION
FOR EXTENSION OF TIME TO FILE REPLY BRIEF on the parties described below
by depositing a copy of same in the United States Mail, postage prepaid, addressed
to their attorneys of record as follows:

ATTORNEYS OF RECORD FOR RESPONDENTS OR RESPONDENTS

David B. Bell, Esquire
Matthew D. Bodman, Esquire
619 Greene Street
Post Office Box 1011
Augusta, Georgia 30903-1101

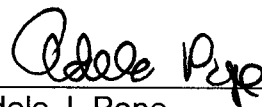
David G. Cannon
P. O. Box 865
Barnwell, SC 29812

Eugene C. Covington, Jr., Esquire
P. O. Box 2343
Greenville, SC 29602

Robert N. Rosen, Esquire
18 Broad Street, Suite 201
Charleston, SC 29401

J. David Black, Esquire
William W. Wilkins, Esquire
Tanya A. Gee, Esquire
William G. Newsome, Esquire
PO Drawer 2426
Columbia, South Carolina 29202-2426

Peter Shahid, Jr., Esquire
89 Broad Street
Charleston, South Carolina 29401



Adele J. Pope
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S.C. Bar No. 4521
Pro Se

July 9, 2014

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

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JUL 10 2014

SC Court of Appeals

July 9, 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: Wilson v. Dallas
Appellate Case No. 2013-001649

Dear Ms. Kitchings:

In connection with the above appeal, enclosed please find:

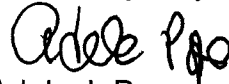
1. An original and seven copies of a Motion for Extension of Time to file Reply Brief;
2. An original and one copy of proofs of service of each; and
3. A check for \$25 for the filing fee.

I trust this is all that is needed to make properly request the extension.

Kindly return a file-stamped copy of each document in the stamped return envelope provided for your convenience.

Thank you.

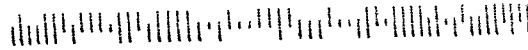
Yours very truly,



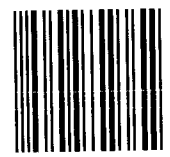
Adele J. Pope
Appellant, *Pro Se*
S.C. Bar No. 4501

cc:

Counsel as shown on proof of service



NEWBERRY, SOUTH CAROLINA 29108



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SC Court of App

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