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STATE OF SOUTH CAROLINA

In the Court of Appeals

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JUL 22 2014
SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

Appeal from Circuit Court Cases

- 2013-CP-02-1647
- 2013-CP-02-2849
- 2013-CP-02-2850
- 2013-CP-02-2851

Appellate Case No. 2014-000794

MICHAEL DEON BROWN, JAMES CURTIS, AND JANE DOE and JOHN DOE
Numbers I, II, III and IV, by their proposed Guardian *ad Litem*, and Adele Pope,
as Creditor/Proponent of Will of James Brown dated June 15, 1999 and on
behalf of Others under S.C. Trust Code § 62-7-405 Appellants,

v.

James B., Terry Brown, Tommie Rae Hynie and David Sojourner, Jr.,
. Respondents.

IN RE:
THE ESTATE OF JAMES BROWN, A/K/A JAMES JOSEPH BROWN

REPLY TO RETURN OF DAVID C. SOJOURNER, JR.

David C. Sojourner, Jr. acting under an *ex parte* limited special
administrator appointment granted by the Aiken County Probate Court and a
limited special trustee appointment currently subject to a pending petition for writ

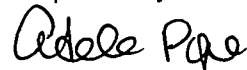
of certiorari to the South Carolina Supreme Court, asks this Court not to terminate the appointment of Georgia attorney David B. Bell, Esquire, who has made repeated and material misrepresentations to both the State and Federal Courts since 2007 in connection with James Brown matters.

Instead of addressing Mr. Bell's improper actions, Mr. Sojourner elects to attack the proposed guardian *ad litem* for real heirs of James Brown. Mr. Sojourner recently attacked now-DNA-proven son Michael Deon Brown.

Mr. Sojourner is actively working to defeat the interest of the HALF (or half + 1) of James Brown's real heirs who are not challenging the estate plan of James Brown or the "I Feel Good" Foundation as embodied in Brown's 2000 estate plan and backup 1999 will, and who will provide the most inexpensive means to protect Brown's copyrights to more than 800 songs for decades. He does so in aid of non-spouse Respondent Tommie Rae Hynie, Plaintiff in Richland County Case 2010-CP-40-4900, with whom Bell is aligned.

Appellants refute each and every allegation of Mr. Sojourner; crave reference to the motion; and ask that it be granted.

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 21, 2014

Attorney for Appellants

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PROOF OF SERVICE

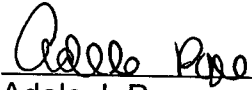
I certify that on the 21st day of July, 2014, I have served the REPLY
TO RETURN OF DAVID C. SOJOURNER, JR. in the above matter on
Respondents as shown below by depositing a copy of same in the United States
Mail, postage prepaid, addressed to them or their attorneys of record as follows:

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

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

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

John F. Beach, Esquire
Adams and Reese, LLP
1501 Main Street, 5th Floor
Columbia, South Carolina 29201



Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108
Telephone: 803-413-0753
Email: adele@popelawfirm.com
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Attorney for Appellants

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Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108
(803) 413-0753

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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: Michael Brown and Others v. James B.
Appellate Case No. 2014-000794

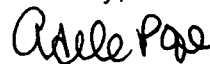
Dear Ms. Kitchings:

In connection with the above-referenced action, enclosed please find an original and seven copies of a REPLY TO RETURN OF DAVID C. SOJOURNER, ESQ. and an original and one copy of the Proof of Service the Reply.

I would appreciate your filing the original and appropriate number of copies and returning a file-stamped copy of each in the stamped return envelope provided.

Thank you for your assistance in this matter.

Sincerely,



Adele J. Pope
Attorney for Appellants

Enclosures
Robert N. Rosen, Esquire
A. Peter Shahid, Esquire
David Bell, Esquire
Matthew D. Bodman, Esquire
John F. Beach, Esquire

UNITED STATES
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