

STATE OF SOUTH CAROLINA
In the Court of Appeals

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AUG 26 2014

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III Circuit Court Judge
The Honorable Liz Godard, Clerk of Court

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.

Counter Designation of Matter to be Included in the Record on Appeal

Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108
(803) 413-0753
adele@popelawfirm.com
SC Bar #4501
Appellant, *pro se*

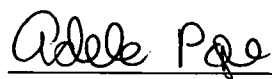
In addition to Appellant's earlier designations and those of Respondent Bauknight, Appellant Designates the Following Matters to be Included in the Record on Appeal:

1. Email Chain among Judge Early, Appellant, Respondents and Others, 6/13/2013 - 7/10/2013 Subject; James Brown - Status Conference and Motions
2. Ltr. Robert L. Buchanan, Jr. to Judge Early, dtd 7/26/2013, Re: The Estate of James Brown Case Nos.: 2008-CP-02-1647; 2007-CP-02-0122; 2008-CP-02-872; and Others With Attachments A
3. Order Directing Payment of Fees and Costs of Special Administrators and Other Relief of the Hon. Doyet A. Early, III, dated 1/8/08, Case 2007-CP-02-0122
4. Complaint to Void Appointment and Notice.. , Case 2007-CP-02-1337, Referenced in June 13 Order as "Claims Case", dtd. 6/10/2013
5. Email of David Black to Judge Early, dtd 8/9/2013, Re: "Next Week Mr Bauknight Will File A Motion To Dismiss the Appeal Filed by Ms. Pope"
6. Affidavit of Adele J. Pope in Support of Voiding Orders, dtd. 7/3/2013,
7. Motion to Vacate, Set Aside, Alter or Amend Orders Dated June 13, 2013, filed 6/24/2013
8. Memorandum in Support of Motion to Vacate, Set Aside, Alter or Amend Orders Dated June 13, 2013, filed 6/24/2013
9. Transcript Hearing, dated 4/6/2009, Case 2008-CP-02-1647, pages 1-3, 79, 80, 81, 82, 83, 84, 85, 86, 87 L1-3, 111*, 112 to L9, 137**, 138 to L15, 141, 142, 143, 144, 145, 148, 149, 150, 151, 155,156 L1-2
10. Transcript Hearing, dtd 7/9/2013, Re: Motion to Alter or Amend June 13 Orders, pages 1-51
11. Email Chain to Judge Early from David Black, Sonny Jones, Robert Rosen and Alan Medlin Re: Request that the July 12 hearing be continued, dated 7/10/2012
12. Email Chain to Judge Early Re: Hearing to set new PR, dated 5/14/2013
13. Motion to Quash Subpoena and Further Supporting Release of Documents Under Seal, Case No. 2007-CP-02-0122, filed 5/17/2012

14. Motion to Expedite Intervention; Add Parties; And Determine Comm'ns. Attys' Fees, Case No. 2008-CP-02-1426, dtd. 5/21/2013
15. Brief in Support of Intervention without Hearing or Expedited Hearing and Scheduling Order, Case No. 2008-CP-02-1426, dated 2/17/2012
16. Email Austin H. Crosby Re: Yesterday's Hearing, dated 5/23/2012
17. Email, Adele Pope to Judge Early Re: Request for Expedited Hearing/Ruling on Mot. to Vacate Dismissal-Gag Orders, Dtd. 7/14/2012
18. Email Chain From Judge Early, Law Clerk Austin H. Crosby Re: Please Conduct Hearing or Issue Order on Voiding Gag Orders, "Update" by Rosen and Medlin and other Responses, Dated 7/10/2012
19. Email of Robert Rosen, esquire to Judge Early, with Copy to Counsel, re: Tommie Rae Diary issues, etc. Order of May 24, 2012
20. Transcript of Hearing, Case 2007-CP-02, 0122, February 9, 2007 before Judge Early, pp. 1, 47, 48.
22. Transcript of Hearing, Case 2007-CP-02, 0122, September 24, 2007 before Judge Early, pp. 1, 51, 55, 70.
23. Transcript of Hearing, Case 2007-CP-02, 0122, May 22, 2012 before Judge Early, pp. 1, 42- 45.
24. Transcript of Hearing, Case 2007-CP-02, 0122, Nov. 15 & 20, 2007 before Judge Early, pp. 1, 74, 101, 127, 330.
25. Transcript of Hearing, Case 2007-CP-02, 0122, June 13, 2007 before Judge Early, pp. 1, 68.
26. Notice of Motion and Motion to Dismiss Tommie Rae Hynie as Party to this Action dated November 25, 2008, Case 1647.
27. Return and Objection to Request of David B. Bell for *Pro Hac Vice* Status, served May 18, 2009, Case 2008-CP-02-1647.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



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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 25th Day of August, 2014, I have served the COUNTER
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
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:

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

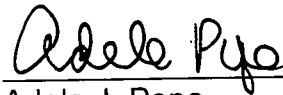
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PROOF OF SERVICE

I certify that on the 25th Day of August, 2014, I have served the INITIAL
REPLY BRIEF AS TO BRIEF OF ESTATE/2000 TRUST (BAUKNIGHT) 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:

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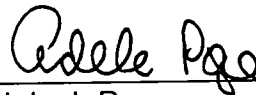
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August 25, 2014

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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

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Re: Wilson v. Dallas
Appellate Case No. 2013-001649

Dear Ms. Kitchings:

In connection with the above appeal, enclosed please find:

1. Original and one copy, INITIAL REPLY BRIEF AS TO BRIEF OF ESTATE/2000 TRUST (BAUKNIGHT);
2. Original and one copy, COUNTER DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL;
3. Original and one copy of proofs of service of each.

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