

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

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OCT 20 2014
SC Court of Appeals

October 19, 2014

The Honorable V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, South Carolina 29211

BY HAND DELIVERY

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

Dear Ms. Allen:

Your letter of October 16 regarding Ms. Gee's October 1 request to delete the Appellant, Respondents and Interested Persons from the Caption of this Appeal arrived on October 17, after the Record on Appeal (ROA) and proof of its service were filed on the 16th.

I filed an objection to Ms. Gee's letter on October 6. I served a second objection, filed on October 8, after counsel for Respondent Dallas wrote the Court. It was filed October 8. The first page of each of those filed objections is enclosed. I am sorry if the titles of the two objections did not make it clear that I was objecting to Ms. Gee's proposal. They set out my position in greater detail.

In short, I do not believe that an administrative change to the caption is appropriate where an objection is made. This is especially so where it serves to remove designated Respondents and the Interested Persons, including the Attorney General, who have been designated as such in this appeal for more than a year without objection. It is important that six of the Respondents elected not to file briefs.

This is an appeal of three orders dated June 13, 2013. The original of 2 of the 3 orders was filed in 2008-CP-02-1647, the case which resulted in the decision in *Wilson v. Dallas* [See ROA, p.29,32]. The third order was filed solely in Case 1647. [ROA 27]. As the orders reflect, each of the Respondents, the Attorney General and the Interested Persons was a party to *Wilson v. Dallas*. Each has a role in the *Wilson v. Dallas* remand which is the subject of the Orders. [See ROA 32]. The caption reflects this.

Ms. Gee's client was not designated as a Respondent in this appeal. By Order of the Honorable Paul E. Short, Jr. filed May 8, 2014, the Estate and 2000 Trust were designated as Respondents Mr. Bauknight was allowed to participate based on Judge Short's order. [See ROA, p. 1-2]

I trust the two objections and this letter will confirm that the attached caption, contained on the ROA, is correct.

Ltr. to the Hon. V Claire Allen
October 19, 2014
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Yours very truly,



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

Enclosures:

Caption
Page 1 of October 3 objection
Page 1 of Objection filed October 8

cc:
Eugene C. Covington, Esquire
Robert N. Rosen, Esquire
Albert P. Shahid, Esquire
Tanya Amber Gee, Esquire
John Andrew Donsbach, Sr, Esquire

**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 the.....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.

RECORD ON APPEAL

Adele J. Pope, SC Bar No. 4501
1228 Walnut Street
Newberry, South Carolina 29108
(803) 413-0753

APPELLANT

Eugene C. Covington, Jr., SC Bar No. 1422
211 Pettigru Street
Post Office Box 2343
Greenville, South Carolina 20602
(864) 242-9000

ATTORNEY FOR RESPONDENT
ALBERT H. DALLAS

Robert N. Rosen, SC Bar No.4918
18 Broad Street, Suite 201
Charleston, South Carolina 29401
(843) 377-1700

ATTORNEY FOR RESPONDENT
TOMMIE RAE HYNIE

Albert P. Shahid, Jr.
89 Broad Street
Charleston, South Carolina 29401
(843) 853-4500

ATTORNEY FOR RESPONDENT JAMES B.

Tanya Amber Gee, SC Bar No. 6112
Post Office Drawer 2426
Columbia, South Carolina 29202
(803) 771-8900

ATTORNEY FOR RESPONDENT ESTATE
OF JAMES BROWN AND JAMES BROWN
2000 IRREVOCABLE TRUST

John A. Donsbach, Sr.
Post Office Box 212139
Martinez, Georgia 30917-2139
(706) 650-8750

ATTORNEY FOR RESPONDENTS TERRY
BROWN AND FORLANDO BROWN

David G. Cannon
Post Office Box 865
Barnwell, South Carolina 29812

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v.

Albert H. Dallas and others, Defendants,

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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.

RETURN TO LETTER/MOTION OF RUSSELL L. BAUKNIGHT
DATED SEPTEMBER 13, 2014

Pursuant to Rule 267 SCACR, the Due Process clause, and for the reasons set
forth below, Appellant objects to the Letter/Motion of counsel for Russell L. Bauknight
dated October 1, 2014, seeking to remove parties to this appeal.

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Of whom Adele J. Pope, Individually and on Behalf of Others under South
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And Terry Brown, Forlando Brown, James B., David G. Cannon, Albert H. Dallas
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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.

**APPELLANT'S RETURN AND MEMORANDUM OPPOSING LETTER/MOTION
OF ALBERT H. DALLAS DATED OCTOBER 3, 2014
TO BE DISMISSED AS PARTY TO APPEAL**

Pursuant to Rules 240 and 267 SCACR, Appellant opposes the letter/
motion of Respondent Albert H. Dallas dated October 3, 2014, a copy of which is
attached as Exhibit A, to be dismissed as a party to this appeal. The request to