

THE STATE OF SOUTH CAROLINA  
IN THE Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

**RECEIVED**

NOV 13 2014

Appellate Case No. 2013-000250

**SC Court of Appeals**

Adele J. Pope,.....Appellant,

v.

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 and former fiduciary status claimed or held as to the Estate of James  
Brown and the James Brown 2000 Irrevocable Trust,.....Respondents,

AND:

Robert L. Buchanan, Jr.,.....Interested Party.

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**RETURN AND OPPOSITION TO MOTION OF ESTATE OF JAMES BROWN  
AND JAMES BROWN 2000 IRREVOCABLE TRUST TO STRIKE  
RECORD ON APPEAL**

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Appellant files this Return and Opposition to the Motion of the Estate of James Brown and the James Brown 2000 Irrevocable Trust (the "Estate/2000 Trust") to Strike the Record on Appeal (ROA) in this Matter. Appellant incorporates in its entirety her Return and Opposition to the motion to strike of Russell L. Bauknight ("Bauknight"), individually, which was made jointly with the

Estate/2000 Trust. In addition to objections set out therein, the Estate/2000 Trust's Motion to Strike should be denied because:

1. The July 2009 Affidavit of Buchanan and Pope is the July 2009 "Notice of Claim from Buchanan and Pope" designated by the Estate/2000 Trust.
2. Appellant offered to supplement the ROA with the inadvertently omitted document before the motion to strike was filed.
4. The Estate/2000 Trust's motion to strike attempts to prevent appellate review of Bauknight's 4 ½-year-old unconstitutional lawsuit.
5. The Estate/2000 Trust is using funds James Brown left to charity to help Bauknight cover up his individual wrongdoing.

**The July 2009 Affidavit was Designated by the Estate 2000 Trust**

The Estate/2000 Trust and Bauknight jointly complain about two items in the ROA which they assert were not designated by any party: The Memorandum/Appendix discussed in the Return previously filed, and the joint affidavit of Robert Buchanan, Jr. and Appellant dated July 13, 2009. [ROA pp. 488 ff.] The July 2009 affidavit was, however, designated by the Estate/2000 Trust as the "July 2009 Notice of Claim from Buchanan and Pope".

The history of this Rule 12(b) dismissal makes it clear that the designation was intended by the Estate/2000 Trust, and understood by Appellant, to be the July 2009 joint affidavit of Buchanan and Pope.

On May 8, 2014, the Supreme Court issued its final opinion in *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013). Three weeks later, on May 29, 2014, Bauknight delivered to Appellant a notice of disallowance with impending bar (the "Disallowance"). It was the Disallowance which required Appellant to file

the June 10, 2013 complaint, which is the subject of this appeal. The

Disallowance said, in relevant part:

The undersigned, as the Special Administrator...disallows all of your claim presented on July 17, 2009...

Your claim was disallowed for the following reason(s):

This claim was filed jointly with Robert L. Buchanan, Jr.... The affidavits you submitted to substantiate your claim describing the hours you spent in these roles confirm this. Further, your claim is based on an overinflated unsubstantiated and self-serving valuation of the probate estate as of the date of Mr. Brown's death.

This claim is disallowed on the basis that the requested fees and commissions were not earned and therefore are not due and owing, and further that the Estate is entitled to an offset for any damages suffered as a result of any maladministration during your service as Co-Personal Representative and Co-Trustee . [ROA, p.440]

On June 10, as required by the notice of impending bar, Appellant filed her complaint. In addition to her claim for commissions and costs, Appellant sought to remove Bauknight for cause, including for his illegal 2010 lawsuit brought as claimed agent for the Attorney General of South Carolina; his continued fiduciary service to Tommie Rae Hynie and her son in light of *Wilson v. Dallas*; and his interference with Appellant's rights under the South Carolina Freedom of Information Act ("FOIA").

Most of Appellant's complaint was dismissed under Rule 12(b), and this appeal followed.

On July 30, 2014, the Estate/2000 Trust designated the following items for the ROA:

12. July 2009 Notice of Claim from Pope and Buchanan
13. May 29, 2013 Notice of Disallowance of Pope and Buchanan's claim

Both the Notice and Disallowance clearly encompassed the July 2009 Buchanan/Pope Affidavit and its 18 Exhibits, which had been disallowed by the Disallowance. There was no need for any counter-designation by Appellant.

Appellant, to moderate the costs of the appeal, fully included three attorneys for the Estate/2000 Trust and two for Bauknight, individually, in the collaborative preparation of the ROA. Copies of the Index, as it was being prepared, were sent to all.

On September 30, 2014 counsel for Bauknight, individually, inquired about the July 2009 affidavit and exhibits in the Index. Appellant replied, with a copy to the Estate/2000 Trust's counsel, William Newsome, Esq., and William Wilkins, Esquire:

Dear Sheila:

The Joint Affidavit is Bob's and my claim which was designated by the Estate/2000 Trust, meaning that I did not need to designate it. Our claim could actually have been considered to be the joint affidavit, PLUS the answer and counterclaims in the Wingate Suit, the Answer and Counterclaim in the Forlando Suit, our response to a Motion for Review of Compensation filed by James B. in 2009 and other things. The Notice of Disallowance purported to disallow all of those claims, and Russell did not to attach to the Notice of Disallowance the actual things he was purporting to Disallow, which is customary.

I believe the Estate/2000 Trust concurs that the affidavit (with Exhibits) is what the Notice of Disallowance intended to disallow, and which was designated by the Estate/2000 Trust – so that I

was not required to designate it.<sup>1</sup>

No objection was made by the Estate/2000 Trust to the explanation. No objection was appropriate. The affidavit was the July 2009 Notice of Claim from Pope and Buchanan, and was understood to be that by all parties.

**The Estate/2000 Trust is using charitable funds to cover up Bauknight's improper lawsuit; his FOIA Interference and his other wrongdoing.**

During the four years the *Wilson v. Dallas* appeal was pending, Bauknight, James Brown's companion, Tommie Rae Hynie, and others expecting extraordinary rewards from the Attorney General's 2008 settlement, filed an illegal lawsuit against Buchanan and Pope.<sup>2</sup> In that lawsuit, Case 4900, a single private attorney acts for the State and Ms. Hynie. Bauknight claims to act as agent for the Attorney General, Ms. Hynie and her son. He is trustee of the Attorney General's Legacy Trust, set up to hold assets of the dismembered "I Feel Good" Trust.

The *Wilson v. Dallas* decision voided Bauknight's appointment. The Attorney General has confirmed private counsel Sweeney, Wingate, & Barrow ("Wingate") was not legally authorized to sue Buchanan and Appellant in the name of the State/Attorney General in Case 4900.

But on November 11, 2014, Bauknight, Ms. Hynie and Wingate - for the

---

<sup>1</sup>

See Exhibit A. While the address to counsel Gee was incomplete, two other attorneys for the Estate/2000 Trust received the Index and explanation, and made no objection.

<sup>2</sup>Richland County Case 2010-CP-40-4900 ("Case 4900").

Attorney General - are continuing the unconstitutional lawsuit. At the very time funds James Brown gave his "I Feel Good" foundation are being spent to harass Appellant with this Motion to Strike, Bauknight is holding all of the following positions in Case 4900:

1. Trustee of the Attorney General's Legacy Trust;
2. Fiduciary and agent for Tommie Rae Hynie;
3. Agent for Ms. Hynie's son James B.; and
4. Claimed agent for the Attorney General.

In March 2013, the Attorney General told the Supreme Court that the State/Attorney General did not authorize Wingate to bring Case 4900 in the name of the State/Attorney General. In November 2014, however, both Wingate and Bauknight still claim to represent Ms. Hynie, her son, the Attorney General and the Attorney General's Legacy Trust in Case 4900.<sup>3</sup>

Since 2011, Bauknight has sought to consolidate three FOIA suits with Case 4900. He has succeeded as to one FOIA suit. By interfering in three FOIA suits, Bauknight has prevented the release of public documents which will show:

1. Bauknight's \$4.7 million claimed value for Brown's music empire is wholly unsupported by the facts and record.
2. Ms Hynie was not Brown's spouse, and the Attorney General, Bauknight, Ms Hynie and other settling parties knew it in 2008.
3. The Wingate Suit is unconstitutional, and Bauknight has no authority to act as the Attorney General's agent in Case 4900.

---

<sup>3</sup>

Exhibit B, emails between November 3-10, 2014, as the Motion to Strike was being filed.

4. The Legacy Trust created by Attorney General McMaster is a public body, subject to FOIA.

It is understandable that Bauknight, individually, would take whatever steps he could to prevent appellate review of his continuing service to Ms. Hynie; his improper lawsuit; and his other disloyalty to the "I Feel Good" Foundation. The Estate/2000 Trust, however, has a duty to protect the use of Charitable funds.

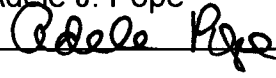
*Wilson v. Dallas* directed that all Attorneys' fees and costs in connection with the Attorney General's voided 2008 settlement be reviewed. That has not happened. Nearly two years after the first *Wilson v. Dallas* decision, \$773,000 paid by the Estate's counsel, a 40% contingency and \$563,000 paid to Wingate, and a quarter of a million dollars paid in two months to Adams and Reece have not been reviewed by any court.

The use of scholarship funds for needy students to cover up Bauknight's wrongdoing should not be condoned. That is the purpose of the unwarranted joint motion to strike.

### **Conclusion**

The joint motion of Russell L. Bauknight and the Estate/2000 Trust to Strike the Record on Appeal should be denied. A supplemental memorandum should be filed, as offered by Appellant, for the inadvertently omitted order and such additional pages of the Memorandum/Appendix of sample documents which Mr. Bauknight, individually, wishes to designate.

Respectfully submitted,  
Adele J. Pope

A handwritten signature in black ink that reads "Adele Pope". The signature is written in a cursive style and is positioned above a solid horizontal line.

1228 Walnut Street  
Newberry, South Carolina 29108  
(803) 413-0753  
adele@popelawfirm.com  
SC Bar No. 4501  
Appellant, *pro se*

November 11, 2014

# Exhibit A

>From: Adele Pope [mailto:adele@popelawfirm.com]  
>Sent: Tuesday, September 30, 2014 8:34 AM  
>To: Sheila Bias  
>Cc: Tg@nexsenpruet.com; rbuchananjr@atlanticbbn.net; BNewsome@nexsenpruet.com;  
>bwilkins@nexsenpruet.com; Fred Crawford; Daisy Bonds  
>Subject: RE: Index to ROA 2014-000250 PDF

Sent to  
Estate/ 2000 Trust  
Counsel Newsome  
and Wilkins. (Address  
of Gee is incorrect.)

>Dear Sheila:

>I will respond quickly this morning and in more detail this afternoon.

>I will be in Columbia tomorrow, and would very much appreciate it if you would  
>leave at your front desk  
>a copy of your intended designation #9, PLUS the 2 other items I was unable to  
>open over the weekend.  
>That would be a great help.

>Without checking against the records, here is the quick answer to your questions:

>1. The Orders which were not separately designated were all part of other  
>documents, but were put in the Orders section,  
>with references to them where they appear below. For example, the January 8, 2008  
>Order, I believe, is in several documents.

>2. Without double checking, I believe the email chain, was described in the  
>designations, but the description in the index is clearer.

>3. The May 29 Notice of Disallowance was attached as an Exhibit to the Complaint,  
>and is probably found elsewhere also.

>4. The Joint Affidavit is Bob's and my claim which was designated by the  
>Estate/2000 Trust, meaning that I did not need to designate it.  
>Our claim could actually have been considered to be the joint affidavit, PLUS the  
>answer and counterclaims in the Wingate Suit, the Answer and Counterclais in the  
>Forlando Suit, our response to a Motion for Review of Compensation filed by James  
>B. in 2009 and other things. The Notice of Disallowance purported to disallow all  
>of those claims, and Russell did not to attach to the Notice of Disallowance the  
>actual things he was purporting to Disallow, which is customary.

>I believe the Estate/2000 Trust concurs that the affidavit (with Exhibits) is what  
>the Notice of Disallowance intended to disallow, and  
>which was designated by the Estate/2000 Trust -- so that I was not required to  
>designate it.

>5. I will check on the Reply to Bauknight's Memorandum in Opposition and respond  
>this afternoon.

>Thanks again in advance for having the document you want added, and the two others  
>for me tomorrow, if possible. I am sorry about the trouble receiving them.

>Best,  
>Adele Pope

><-----Original Message----->

>>From: Sheila Bias [SBias@RichardsonPlowden.com]

>>Sent: 9/29/2014 4:11:17 PM

>>To:



**From:** Adele Pope [mailto:[adele@popelawfirm.com](mailto:adele@popelawfirm.com)]

**Sent:** Monday, November 03, 2014 11:54 AM

**To:** [dearlyj@sccourts.org](mailto:dearlyj@sccourts.org)

**Cc:** [BNewsome@nexsenpruet.com](mailto:BNewsome@nexsenpruet.com); [rbuchananjr@atlanticbbn.net](mailto:rbuchananjr@atlanticbbn.net); [asilvernail@mkb-law.com](mailto:asilvernail@mkb-law.com); Ken B. Wingate; [esmith@scag.gov](mailto:esmith@scag.gov); [jmcintosh@scag.gov](mailto:jmcintosh@scag.gov); [rcook@scag.gov](mailto:rcook@scag.gov); [agwilson@scag.gov](mailto:agwilson@scag.gov);

[jdonsbach@donsbachking.com](mailto:jdonsbach@donsbachking.com); [FCrawford@RichardsonPlowden.com](mailto:FCrawford@RichardsonPlowden.com); [sbias@RichardsonPlowden.com](mailto:sbias@RichardsonPlowden.com)

**Subject:** Re: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

Dear Judge Early:

Thank you very much. The following is, I believe, a summary of Case 2010-CP-40-4900 ("Case 4900"), counsel:

The law firm of Kenneth Wingate, Esquire, (SWB) is the only attorney of record for the Attorney General and ALL Plaintiffs, but:

- a. Plaintiff Attorney General has terminated SWB.
- b. Emory Smith of the Attorney General's office represents the Attorney General in the FOIA Suit which has been consolidated with Case 4900.
- c. Counsel for Plaintiff James Brown Legacy Trust ("Legacy Trust"), controlled by the Attorney General, is unclear. SWB is still attorney of Record for the Legacy Trust. Mr. Bauknight is the trustee.
- d. Plaintiff Daryl Brown has terminated both SWB and Levenson; but no attorney has appeared for him in Case 4900.
- e. Plaintiff Terry Brown has terminated both SWB and David Bell/Matt Bodman, and hired Scott Keniley and John Donsbach, but neither has appeared for him in Case 4900.
- f. Adult Plaintiffs Tommie Rae, Jason Lewis, Lindsey Brown, Janice Venisha Brown, Tonya Brown, Deanna, Yamma, Venisha and Larry Brown are represented by SWB, and I do not believe there has been any change in counsel status.
- g. The Estate of James Brown and the James Brown 2000 Irrevocable Trust are represented by SWB, but the Complaint says the Charitable Interests are being protected by the Attorney General.
- h. Minors James B., Sydney L. and Carrington L. are represented by SWB and Mr. Bauknight as their agent. No GAL has been appointed.
- i. Adam Silvernail of Moses & Brackett is my attorney in Case 4900 and the consolidated FOIA

Suit.

I am taking the liberty of copying this to known counsel, and hope they will respond to you if I have made an error.

Again, thank you for helping bring this to a conclusion.

Adele Pope  
November 3, 2014

<-----Original Message----->

>From: Early, Doyet A. [[dearlyj@sccourts.org](mailto:dearlyj@sccourts.org)]

>Sent: 11/3/2014 11:10:39 AM

>To: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)

>Cc: [BNewsome@nexsenpruet.com](mailto:BNewsome@nexsenpruet.com)

>Subject: Re: Aiken County Case 2013-CP-02-1337

>

>Who represents the parties in the Richland case? I spoke with Judge Manning and he is on board. Please advise

>

>Sent from my iPhone

>

>> On Oct 29, 2014, at 10:36 AM, Adele Pope <[adele@popelawfirm.com](mailto:adele@popelawfirm.com)> wrote:

>>

>> Dear Judge Early:

>>

>> Responding to your direction made at the hearing yesterday, I nominate the following persons as a mediator.

>>

>> First Choice : Michael Polk

>> Second Choice: Karl Folkens

>>

>> I did not know Michael Polk personally, but called him this morning and believe he has no conflicts. His rate is \$250 per hour, and he is in Columbia. That is a substantial consideration for me, as I must be mindful of all costs.

>>

>> Should we choose to have a voluntary "global" mediation of all issues between the Estate, 2000 Trust, the Attorney General,

>> Russell, Bob Buchanan and me in the Forland Suit; the Wingate Suit; the consolidated FOIA suit ; and the pending appeals,

>> I would suggest Mr. Folkens. His prior experience in the Wingate Suit mediation would be helpful.

**From:** "Adam T. Silvernail" <asilvernail@mkb-law.com>  
**To:** "Adele Pope" <adele@popelawfirm.com>  
**Subject:** Fwd: Aiken County Case 2013-CP-02-1337/Richland County Case 4900  
**Date:** 11/4/2014 6:17:13 AM

Sent from my iPhone

Begin forwarded message:

**From:** "Mark V. Gende" <MVG@swblaw.com>  
**Date:** November 3, 2014 at 4:16:03 PM EST  
**To:** "dearlyj@sccourts.org" <dearlyj@sccourts.org>  
**Cc:** "BNewsome@nexsenpruet.com" <BNewsome@nexsenpruet.com>, "rbuchananjr@atlanticbbn.net" <rbuchananjr@atlanticbbn.net>, "asilvernail@mkb-law.com" <asilvernail@mkb-law.com>, "Ken B. Wingate" <KBW@swblaw.com>, "esmith@scag.gov" <esmith@scag.gov>, "jmcintosh@scag.gov" <jmcintosh@scag.gov>, "rcook@scag.gov" <rcook@scag.gov>, "agwilson@scag.gov" <agwilson@scag.gov>, "jdonsbach@donsbachking.com" <jdonsbach@donsbachking.com>, "FCrawford@RichardsonPlowden.com" <FCrawford@RichardsonPlowden.com>, "sbias@RichardsonPlowden.com" <sbias@RichardsonPlowden.com>, "Joseph O. Thickens" <jot@swblaw.com>, "dblack@nexsenpruet.com" <dblack@nexsenpruet.com>  
**Subject:** RE: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

Your Honor:

In response to Mrs. Pope's email below, Sweeny, Wingate & Barrow, PA has not been terminated by any Case 4900 plaintiff. However, SWB has filed a motion to be relieved as counsel for the Office of the Attorney General, and the AG has filed a motion to withdraw from the case. Neither of these motions have been heard or ruled upon and no substitutions of counsel motions have been filed. Therefore, technically speaking SWB is still counsel of record for all plaintiffs in Case 4900.

If there is a global mediation involving Case 4900, Mr. Folkens is the best choice for a mediator due to his knowledge gained through his prior attempt to mediate the case.

Please let me know if there is any other information you desire.

Mark V. Gende, Esq.  
Sweeny, Wingate, & Barrow, PA  
1515 Lady Street  
Columbia, South Carolina 29201  
803.256.2233 – Phone  
803.256.9177 – Facsimile

---

**From:** Ken B. Wingate  
**Sent:** Monday, November 03, 2014 12:59 PM  
**To:** Mark V. Gende  
**Subject:** FW: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

From: Adele Pope Date: 11/10/2014 8:51:41 AM  
To: agsjones@scag.gov; esmith@scag.gov; JMcIntosh@scag.gov;  
BNewsome@nexsenpruet.com; kbw@swblaw.com

Cc:  
rlbuchananjr@atlanticbbn.net, TGee@nexsenpruet.com, BWilkins@nexsenpruet.com, DBlack@nexsenpruet.com, FCrawford@RichardsonPlowden.com, SBias@RichardsonPlowden.com, rbauknight@BPSCPAS.COM, asilvernail@mkb-law.com

TO: ATTORNEY GENERAL ALAN WILSON, BILLY NEWSOME, ESQ., KEN WINGATE, ESQ.

FROM: ADELE POPE

DATE: NOVEMBER 10, 2014

RE: ATTORNEY GENERAL'S TIMELY DESIGNATION OF MEDIATOR IN COURT-ORDERED CASE 4900 MEDIATION, AND RELATED ISSUES

Dear Attorney General, Billy and Ken:

Billy's answer below left us with some questions about how to proceed and make the most of the wonderful opportunity created by Judge Early and Judge Manning in their mediation directive of November 3, 2014.

I am hoping Attorney General Wilson, Emory, or whoever is now prosecuting Case 2010-CP-40-4900 for the Legacy Trust and the State/Attorney General Wilson, and defending against our counterclaims, can answer these questions. I would like to report our progress to Judge Early and Judge Manning in a few days. [Judge Early's deadline for designating a mediator is Friday.]

1. Does Attorney General Wilson agree to Mike Polk as first choice for mediator, and Karl Folkens as second?
2. Is December 19th acceptable as the date for mediation if Karl Folkens is the choice? Otherwise?
3. In answering, is Attorney General Wilson speaking for himself AND for the James Brown Legacy Trust?
4. Does Attorney General Wilson agree that the 2011 FOIA case which was consolidated but not merged with Case 4900 is NOT a proper subject of mediation, and should be heard in the first instance?
5. Does Attorney General Wilson agree that the 2011 FOIA case against the State/AG and the Legacy Trust which he was formerly seeking to consolidate with Case 4900, which seeks copies of the Legacy Trust and documents related to the \$4.7 million valuation claim, is NOT properly the subject of mediation, and should be heard in the first instance?

6. Does anyone other than Attorney General Wilson or his staff have the right to communicate with Judge Manning and/or Judge Early about the Attorney General's position or the position of the James Brown Legacy Trust in the mediation Judge Early said on November 3, 2014 he and Judge Manning were ordering? If so, who has such authority?

7. Does Attorney General Wilson agree that the Plaintiffs who sued Mr. Buchanan and me, and who are counterclaim defendants, must attend the mediation if it is to be meaningful?

8. Does the Attorney General agree that the failure of about half of Plaintiff/Counterclaim Defendants to attend the 2012 mediation was a substantial impediment to the mediation process?

9. Does the Attorney General agree that the appropriate subject of the Case 4900 mediation is the claims made by the Plaintiffs against Robert Buchanan, Jr. and Adele Pope, and the answers and counterclaims made by Buchanan and Pope against those who sued them?

It would be great if we could get these answers together in the next few days so there will be plenty of time to report your responses to Judge Early and Judge Manning before the end of the week.

Thank you in advance for your help with this important mediation.

Best,

Adele Pope

November 10, 2014

P.S. I will ask Adam to forward this to anyone I may have inadvertently omitted

<-----Original Message----->

>From: Newsome, William G. [BNewsome@nexsenpruet.com]

>Sent: 11/9/2014 5:36:59 PM

>To: adele@popelawfirm.com;kbw@swblaw.com

>Cc:

>rbuchananjr@atlanticbbn.net;adam@silvernailfirm.com;TGee@nexsenpruet.com;TGee@

>nexsenpruet.com;BWilkins@nexsenpruet.com;BWilkins@nexsenpruet.com;DBlack@nexsenpr

u

>et.com;DBlack@nexsenpruet.com;FCrawford@RichardsonPlowden.com;SBias@RichardsonPl

ow

>den.com;rbauknight@BPSCPAS.COM

>Subject: RE: MEDIATION IN RICHLAND COUNTY CASE 2010-CP-40-4900 and AIKEN  
CASE 1337

>[IWOV-NPCOL1.FID1033932]

>

>Adele: Your email below is completely unfounded and absurd. I have never

>directly, indirectly or in any other way refused to follow Judge Early's and Judge

>Manning's order to mediate case 1337 and case 4900.

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

NOV 13 2014

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Doyet A. Early, III Circuit Court Judge

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Appellate Case No. 2014-000250

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Adele J. Pope ..... Appellant,

v.

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 and former fiduciary status claimed or held as to the Estate of James  
Brown and the James Brown 2000 Irrevocable Trust,.....Respondents,

AND:

Robert L. Buchanan, Jr.,.....Interested Party.

---

**PROOF OF SERVICE**

---

I certify that on the 11<sup>th</sup> day of November, 2014, I served the RETURN  
AND OPPOSITION TO MOTION OF ESTATE OF JAMES BROWN AND JAMES  
BROWN 2000 IRREVOCABLE TRUST TO STRIKE RECORD ON APPEAL on  
Respondents and on the Interested Party by hand-delivery, or by depositing a  
copy of same in the United States Mail, postage prepaid to them or their  
attorneys of record as follows:

William Wilkins, Esquire  
J. David Black, Esquire  
Tanya A. Gee, Esquire  
William G. Newsome, III Esquire  
Nexsen Pruet  
1230 Main Street, Suite 700

P.O. Box 2426  
Columbia, South Carolina, 29202-2426  
Attorneys for Respondent Estate of James Brown  
and James Brown 2000 Irrevocable Trust

Sheila Bias, Esquire  
Frederick Crawford, Esquire  
Richardson, Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, South Carolina 29202  
Attorneys for Respondent Russell L. Bauknight, Individually

Robert L. Buchanan, Jr.  
212 Newberry St., NW  
Post Office Box 463  
Aiken, South Carolina 29802  
Interested Party



Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108  
Telephone: 803-413-0753  
Email: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)  
S.C. Bar No. 4501  
*Pro Se*

November 11, 2014

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NOV 13 2014

**SC Court of Appeals**

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

November 11, 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

**RECEIVED**

NOV 13 2014

**SC Court of Appeals**

Re: Pope v. Estate of James and Others  
Appellate Case No. 2014-000250

Dear Ms. Kitchings:

In connection with the above appeal, enclosed please find the following:

1. Original and six copies, Return and Opposition to Motion of Estate of James Brown and James Brown 2000 Irrevocable Trust to Strike Record on Appeal ;
2. Original and One Copy of Certificate of Service.

Kindly file the required number and return a file-stamped copy of each with the person who delivers these documents. Thank you.

Yours very truly,



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

Enclosures:

cc:

Tanya A. Gee, Esquire  
William W. Wilkins, Esquire  
J. David Black, Esquire  
William G. Newsome, III, Esquire  
Sheila M. Bias, Esquire  
Frederick A. Crawford, Esquire  
Robert L. Buchanan, Jr.

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

November 11, 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

**RECEIVED**

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Re: Pope v. Estate of James and Others  
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2. Original and One Copy of Certificate of Service.

Kindly file the required number and return a file-stamped copy of each with the person who delivers these documents. Thank you.

Yours very truly,



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

Enclosures:

cc:

Tanya A. Gee, Esquire  
William W. Wilkins, Esquire  
J. David Black, Esquire  
William G. Newsome, III, Esquire  
Sheila M. Bias, Esquire  
Frederick A. Crawford, Esquire  
Robert L. Buchanan, Jr.