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SC Court of Appeals

THE 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

Lower Ct. Case No. 2013-CP-02-1337

Appellate Case No. 2014-00250

Adele J. PopeAppellant,

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,

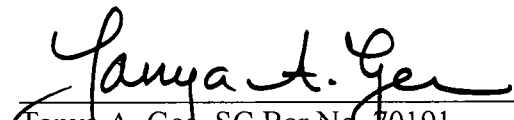
RESPONDENTS' DESIGNATION OF MATTER

Respondents propose the following be included in the Record on Appeal:

1. January 17, 2014 Order of Judge Early
2. February 4, 2014 Order of Judge Early Denying Motion to Alter or Amend
3. October 3, 2013 Interim Order of Judge Early
4. January 30, 2014 Court of Appeals Order
5. May 9, 2013 Order of the Probate Court appointing Bauknight as emergency SA/ST
6. June 13, 2013 Form 4 Order assigning new case number to Fee Petition

7. June 13, 2013 Administrative Order of Judge Early regarding Case Nos: 2008-CP-02-1647, 2007-CP-02-0122, 2008-CP-02-0872
8. June 13, 2013 Administrative Order of Judge Early regarding 13 pending appeals in Estate of Brown
9. June 10, 2013 Complaint filed by Adele Pope
10. July 10, 2013 Motion to Dismiss filed by Respondents
11. January 25, 2014 Motion to Alter or Amend (and exhibits) filed by Pope
12. July 2009 Notice of Claim from Pope and Buchanan
13. May 29, 2013 Notice of Disallowance of Pope and Buchanan's claim
14. December 3, 2013 Transcript in its entirety

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


Tanya A. Gee, SC Bar No. 70191
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Attorney for Russell L. Bauknight, the
Special Administrator of the Estate of
James Brown and the Special Trustee of
the James Brown August 1, 2000
Irrevocable Trust Agreement

July 30, 2014

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AND:

Robert L. Buchanan, Jr.,Interested Party.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing *Respondents' Initial Brief and Designation of Matter* has been served upon counsel of record by depositing a copy of the same, first-class postage prepaid, in the United States Mail, on the 30th day of July, 2014, to the addresses shown below.

Adele J. Pope
1228 Walnut Street
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RICHARDSON PLOWDEN
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Columbia, South Carolina 29202

Robert L. Buchanan, Jr.
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NEXSEN PRUET, LLC

Columbia, South Carolina

Tanya A. Gee
Special Counsel

July 30, 2014

VIA HAND DELIVERY

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

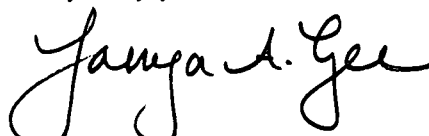
Re: *Adele J. Pope v. Estate of James Brown, Deceased: The James Brown 2000 Irrevocable Trust; Russell L. Bauknight, Individually, as former Exécutor de son tort, and in every current and former fiduciary status claimed or held as to the Estate of James Brown and The James Brown 2000 Irrevocable Trust AND Robert L. Buchanan, Jr.*
Appellate Case No. 2014-00250

Charleston
Charlotte
Columbia
Greensboro
Greenville
Hilton Head
Myrtle Beach
Raleigh

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter are the original and two copies of the *Initial Brief Of Respondents* and *Respondents' Designation Of Matter* in the above referenced matter. Please return a received-stamped copy to me via our courier. Also enclosed is the *Proof Of Service* reflecting that counsel of record have been served with copies of the same.

Very truly yours,



Tanya A. Gee
Special Counsel

TAG/hjr
Enclosures

cc w/encl.: Adele J. Pope
Frederick Crawford, Esquire
Robert L. Buchanan, Jr.

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