

STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2014-000250

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.

SUPPLEMENT TO RECORD ON APPEAL

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

INDEX TO SUPPLEMENT TO RECORD ON APPEAL

I. ORDERS AND JUDGMENTS

Order of the Hon. Sue H. Roe dtd. May 9, 2013.....1

2007CP0200122

IN THE PROBATE COURT

STATE OF SOUTH CAROLINA

COUNTY OF AIKEN

HENRY DARGAN McMASTER, in his capacity as Attorney General of the State of South Carolina; DARYL J. BROWN, individually and on behalf of his minor children, LINDSEY DELORES BROWN and JANISE VANISHA BROWN; DEANNA J. BROWN THOMAS, individually and on behalf of her minor children, JASON BROWN LEWIS; YAMMA N. BROWN, individually and on behalf of her minor children, SYDNEY LUMAR, CARRINGTON LUMAR, and TONYA BROWN; VANISHA BROWN; LARRY BROWN; TERRY BROWN; and TOMMIE RAE BROWN,

Petitioners,

In re: Estate of James Brown

CASE NO: 2007-ES02-0056

ORDER IN RE:
APPOINTMENT OF SPECIAL
ADMINISTRATOR

Copy 5-10-13
FILED

Liz Hodard
C.C.P. & G.S.
Anita Knoepke
Deputy Clerk

This matter came before the Court on emergency petition of Petitioner, Russell Bauknight, in his capacity as Special Administrator of the Estate of James Brown (the "Estate"), by and through his counsel, whereby he requested pursuant to applicable South Carolina law, including but not limited to, Sections 62-3-614 and 62-3-617 of the South Carolina Probate Code, that the Court immediately, and without hearing, or as soon as possible and before any other matter, address its Order dated August 6, 2009 appointing Russell Bauknight as Special Administrator in light of the Order of the South Carolina Supreme Court issued on May 8, 2013. After full consideration and after determination that emergency exists pursuant to S.C. Code §62-3-614(2), the Court finds as follows:

1. By order of the South Carolina Supreme Court dated May 8, 2013;

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SMR

Bauknight's appointment as Personal Representative was held to be void. By its terms, this Court's Order dated August 6, 2009 appointing Bauknight as Special Administrator is valid until such time as the appeals of various orders related to the removal of former Personal Representatives and the appointment of Bauknight as Personal Representative have been finally concluded.

2. The Estate and Trust of James Brown may suffer irreparable harm, and in order to adequately protect, preserve, and manage the Estate assets, and to secure the Estate's proper ongoing administration, it is imperative that there not be any gap in time where no fiduciary is appointed to manage the business of the Estate. As an example of the daily management responsibilities of the Estate, Mr. Bauknight receives on average eight to ten "music clearances" a week. If there is even a question in the marketplace that Mr. Bauknight might not have authority to act on behalf of the Estate, the Estate will suffer irreparable and substantial financial harm.

3. Mr. Bauknight entered into an agreement with a joint venture of Imagine Entertainment (owned by Ron Howard and Brian Grazer) and Jagged Pictures (owned by Mick Jagger) granting an option to produce a movie on the life of James Brown. The Estate stands to lose millions of dollars in the future if the movie option is not exercised. The producers have expressed concern (in light of the continuing litigation) over whether they will exercise the option and continue to move forward with the movie. The revised Order of the Supreme Court declaring Mr. Bauknight's appointment as Personal Representative to be void creates even more uncertainty over whether the producers will exercise the option.

4. This Court's Order is necessary in order to adequately protect, preserve, and

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SMR

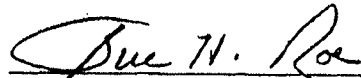
manage the Estate's assets, and serves the Estate's proper administration.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED:

1. This Order confirms this Court's Order dated August 6, 2009 and grants continuing and ongoing authority of Russell L. Bauknight as Special Administrator, pending further order of the Court, with full, exclusive and absolute authority to carry out the administration of the Estate, and all business related thereto, including but not limited to authority to execute, confirm and/or ratify any prior actions taken on behalf of the Estate by a fiduciary. This authority includes, but is not limited to authority to execute, confirm and/or ratify any and all documents necessary to complete the agreement to produce and finalize the movie on the life of James Brown and to continue licensing the use of the music and other intellectual property of James Brown.

2. No bond is required to be posted in connection with this Order.

AND IT IS SO ORDERED.



The Honorable Sue H. Roe
Aiken County Probate Judge
Post Office Box 1576
Aiken, South Carolina 29802-1576

Aiken, South Carolina


May 9th, 2013


*Page # 3
of 3 pages*

**STATE OF SOUTH CAROLINA
COUNTY OF AIKEN**

THIS IS TO CERTIFY THAT THE FOREGOING IS A TRUE AND
CORRECT COPY OF THE ORIGINAL ON FILE IN THIS COURT
WITNESS MY HAND AND SEAL OF THE COURT THIS THE

9th DAY OF May A.D. 2013


JUDGE OF PROBATE FOR AIKEN COUNTY, S.C.

BY 
CLERK

THE STATE OF SOUTH CAROLINA
IN THE Court of Appeals

APPEAL FROM AIKEN COUNTY
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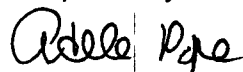
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Brown and the James Brown 2000 Irrevocable Trust,.....Respondents,

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

**CERTIFICATE OF COUNSEL RELATED TO SUPPLEMENT TO
RECORD ON APPEAL**

The undersigned Appellant, *pro se*, hereby certifies that the Record on
Appeal filed herein with the Supplement served today, to be filed, contains all
material proposed to be included by any of the parties and not any other material.

Respectfully submitted,



Adele J. Pope, *pro se*, SC Bar No. 4501
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December 3, 2014

STATE OF SOUTH CAROLINA
In the Court of Appeals

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The Honorable Doyet A. Early, III Circuit Court Judge

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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 3rd day of December 2014, I served three copies of
the CERTIFICATE OF COUNSEL RELATED TO SUPPLEMENT TO RECORD
ON APPEAL on Respondents 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:

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Tanya A. Gee, Esquire
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William Wilkins, Esquire
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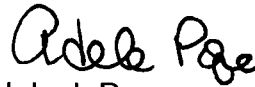
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SC Court of Appeals

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December 3, 2014