

**RECEIVED**

MAR 31 2015

**STATE OF SOUTH CAROLINA  
In the Supreme Court**

**S.C. Supreme Court**

**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.

---

**MOTION TO EXPEDITE APPEAL  
AND MEMORANDUM IN SUPPORT OF EXPEDITED APPEAL**

---

TO: THE HONORABLE CHIEF JUSTICE AND THE ASSOCIATE JUSTICES OF THE  
COURT:

Based on the brief filed by Respondent Terry Brown on March 24, 2015, in the

United States Supreme Court, and on other recent developments in this appeal, Plaintiff moves this Honorable Court for an order expediting this appeal. A portion of Terry's brief is attached as Exhibit A.

Appellant's motion is supported by the affidavit of Adele J. Pope filed herewith, and orders of the Honorable Doyet A. Early, III, on file in this appeal.

### **Memorandum in Support of Expedited Appeal**

Any fiduciary protecting James Brown's "I Feel Good" Foundation and its 892 copyrights should expect attacks from disgruntled heirs and claimed heirs. James Brown expected them. He planned for them.

What nobody should have expected was State support for those attacks.

On May 19, 2010, the Attorney General joined Respondents Terry Brown (Terry), Tommie Rae Hynie and others seeking to set aside the "I Feel Good" Trust in a suit against Appellant and Robert Buchanan, Jr. Since then, the State has bolstered Terry in his venomous and false attacks on Appellant and Buchanan.

In 2011, the AG and Terry, with Hynie, began working to stop FOIA compliance. They have been successful for almost four years.

In January 2011 the AG and Terry amended the Legacy Trust so that Terry's son could try to sell Brown's music empire for as much as \$200 million. Both then told this Court that Russell Bauknight's false claim to the IRS that Brown's music empire was worth \$4.7 million when Brown died was correct. Both did so without reviewing the "appraisal" on which the false value was based.

Terry knew the \$4.7 million claim to be false. He had access to the 2006 \$42

million Royal Bank of Scotland appraisal of Brown's major royalties, and other documents showing the claim to be false. He had been part of two \$90 - \$100 million letters of intent to buy the music empire in 2008. But Terry helped the AG – and the AG helped Terry – suppress these documents both in discovery in Case 2010-CP-40-4900 ("Case 4900") and by FOIA interference and noncompliance.

Terry also knew Bauknight's \$.5 million value claimed to the IRS for Brown's tangible personal property (TPP) was wrong. Terry had made a \$2 million offer for the TPP in 2008.

In his brief, Terry attacks the Christie's sale which took place in 2008. He overlooks that the Christie's sale was approved in three court orders. Terry did not seek reconsideration of, or appeal, any of them.

Terry fails to disclose that he was aligned with the former Cannon trustees, who were working with Terry's son, Respondent Forlando Brown, to disrupt the Christie's sale. He does not disclose that his former lawyer was working with Kilpatrick Stockton (KS) in early 2011 when the KS website was modified to include the incorrect GRAMMY post. The AG's alliance with Terry lends credence to otherwise unbelievable claims.

The AG has been a co-plaintiff with Terry and Hynie in Case 4900 for almost five years. The AG and Terry have prevented discovery in Case 4900 since late 2010. The AG and Terry continue to work together to prevent compliance with FOIA requests made by Appellant in 2011.

Judge Early's orders of June 13, 2013, which are the subject of this appeal, purport to deprive Appellant of the ability to fairly protect herself from Terry's false

claims.

### Conclusion

Appellant's request to expedite this appeal should be granted. It is necessary to restore Appellant's Due Process, First Amendment and other rights. It will give Appellant a fair opportunity to repair the damage caused to her reputation and career by her proper service under the estate plan of James Brown, and to the "I Feel Good" Foundation and its 892 copyrights.

Respectfully submitted,



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

March 26, 2015

# Exhibit A

No. 14-1031

---

In the Supreme Court of the United States

---

In re: THE ESTATE OF JAMES BROWN  
A/K/A JAMES JOSEPH BROWN

ADELE POPE, ET AL.,

*Petitioners,*

-v-

JAMES B., ET AL.,

*Respondents.*

---

On Petition for Writ of Certiorari  
to the Supreme Court of South Carolina

---

## BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

---

J. BRIAN KING

*COUNSEL OF RECORD*

JOHN A. DONSBACH, SR.

DONSBACH & KING, LLC

504 BLACKBURN DRIVE

AUGUSTA, GA 30907

(706) 650-8750

BKING@DONSBACHKING.COM

SCOTT KENILEY

KENILEY-KUMAR, LLC

2 RAVINIA DRIVE,

SUITE 500

ATLANTA, GA 30346

(770) 263-0000

COUNSEL FOR RESPONDENT TERRY BROWN

MARCH 24, 2015

---

SUPREME COURT PRESS ♦ (888) 958-5705 ♦ BOSTON, MASSACHUSETTS



## OPINIONS BELOW

Petitioner seeks review of the South Carolina Supreme Court Order (Pet.App.1a) denying her Petition for Writ of Certiorari to the South Carolina Supreme Court (Pet.App.1a) seeking review of the South Carolina Court of Appeals Order (Pet.App.4a) declaring her not to be a party to Case No. 2008-CP-02-1647 and thereby dismissing her appeal of the following lower court Orders: 1) Order Severing Omitted Spouse Claim, Elective Share Claim and Pretermitted Child Claim dated December 16, 2013 (Pet.App.22a); 2) Order Dismissing Cross-Claims of Cinnamon Nicole Parris and La Rhonda Pettit, dated January 8, 2014 (Pet.App.20a); and 3) Order Determining Parties to Severed Omitted Spouse Claims, Elective Share Claim, and Pretermitted Child Claim, dated February 7, 2014 (Pet.App.11a).



## JURISDICTION

Contrary to Petitioners' assertion, this Court lacks jurisdiction under 28 U.S Code § 1257 because there has been no final order in this matter.



## INTRODUCTION

The Petition for Writ of Certiorari in this matter is born out of a long line of venomous litigation

involving the estate of the late great entertainer, James Brown, also known as the Godfather of Soul and the hardest working man in show business. James Brown died on December 25, 2006, leaving an estate embroiled in litigation encompassing multiple cases, multiple courts and multiple greedy people who were not part of James Brown's testamentary intent, but whose personal motives are to deprive needy children of an education. Adele Pope ("Pope") is one of those people. Respondent Terry Brown would contend that the Petition for Writ of Certiorari was filed merely to create leverage for an impending court ordered mediation scheduled for March 23, 2015 (which has since been cancelled as a result of a South Carolina Supreme Court Stay) where Pope would advance her interest to be paid a \$5 million fiduciary fee based on unsupported estate and trust valuations and defend against the damage she did to the trust and the needy children from Georgia and South Carolina. This matter is neither ripe, nor brought by a party (Pope) with standing.

Contrary to the style of the case and statements in her brief, Pope solely brings this action in her own name. There is no et. al. as Pope suggests, and therefore she has no standing. Pope's interest as an "other" pursuant to South Carolina Probate Code has no relation to copyright terminations and her arguable position as an "other" creates an inherent, non-waivable conflict of interest. Pope is not a potential beneficiary to James Brown's copyright termination rights or estate. Pope does not represent any person who she claims has been damaged by a South Carolina State Court and has not been given permission to speak on their behalf. Pope does not

represent any of James Brown's children, potential heirs or copyright termination beneficiaries. Pope does not represent any needy child from Georgia or South Carolina and has sought no class of equally situated plaintiffs with a duly recognized named plaintiff.

Contrary to Pope's publicized position to the courts and the media that she is the only person supporting the Trust and scholarships for needy children, the facts clearly demonstrate she has ulterior motives. Pope's only interest in utilizing this Honorable Court is to advance her reputation and financial position. It has nothing to do with the federal questions related to copyright terminations or scholarships pursuant to the Trust as she claims. Pope has no standing or interest in the James Brown estate, trust or copyrights/termination rights. Additionally, the crux and foundation of her complaints herein, *i.e.* whether Tommie Rae Hynie ("Hynie") is James Brown's widow or a bigamist, has not been heard at any appellate level in South Carolina and is currently still pending in the South Carolina Court of Common Pleas for Aiken County.

Pope, ironically, has no interest in the scholarships for needy children from Georgia and South Carolina and in fact seeks to dilute the scholarship pool with self-serving, unsupported, unsubstantiated valuations that would create an economic advantage for her and her alone. Pope, for her limited time as personal representative and trustee claims a fee based on the value of the estate and Trust. Even though Pope unilaterally submits, to this Honorable Court and other Courts, self-serving

estate values of \$100 million dollars and \$84 million respectively, no such valuations have ever been formally made. Pope has neither sought nor provided any actual or professional estate or music empire valuation performed by competent and respected professionals. Interestingly, on November 14, 2007, when Pope was still the Special Administrator, she filed a Return and Recommendation in the circuit court in Aiken opposing the engagement of professionals to evaluate the estate and instead proposing that the estate be valued by applying a formula created and adopted by Pope. Based on her formula, Pope demands, in litigation that is still pending in South Carolina Courts, to be paid \$5 million dollars in fees for her services as fiduciary for a relatively short interval of time from March 12, 2007 (as special administrator) to November 20, 2007 (appointed Personal Representative and Trustee) to May of 2009 (removed by circuit court in Aiken County and replaced with Russell Bauknight, which removal was ultimately affirmed by the Supreme Court of South Carolina).



#### STATEMENT OF THE CASE

James Brown, by his will dated August 1, 2000, devised only his personal and household effects to six adult named children: Deanna J. Brown Thomas, Yamma N. Brown, Vanisha Brown, Daryl J. Brown, Larry Brown and Terry Brown. James Brown left the remainder of his estate magnanimously to The James Brown 2000 Irrevocable Trust via a pour-over

provision in his Will. James Brown created the 2000 Irrevocable Trust under a separate agreement, also dated August 1, 2000, as part of his estate plan to provide financial assistance for the education of his grandchildren and disadvantaged youths. Upon James Brown's death, the principal and income contained in the 2000 Irrevocable Trust was to be divided into two subtrusts: 1) The Brown Family Education Trust, which was capped in the amount of \$2 million and designated for the education of Brown's grandchildren; and 2) The James Brown "I Feel Good" Trust ("Trust"), a charitable trust to be used solely for the education of poor children in South Carolina and Georgia. Essentially, his children, by all practical appearances, were left out of the musical revenue streams. As a result, Deanna J. Brown Thomas, Yamma N. Brown, Vanisha Brown, Daryl J. Brown and Larry Brown, along with Hynie contested the will and initiated litigation to seek for themselves what James Brown intended for his grandchildren and needy children from Georgia and South Carolina. Only Terry Brown ("Terry"), the Respondent represented by this Brief in Opposition, did not contest his father's last wishes. The Will included an *in terrorem* clause ("No Contest Clause") providing that if the heirs challenged the Will, they would lose the property bequeathed to them in the Will. Since his death in 2006, no payments have been made supporting educational efforts for James Brown's grandchildren or the poor children from Georgia and South Carolina.

James Brown named Buddy Dallas, Al Bradley and David Cannon as the original co-personal representatives of the estate and co-trustees of the

2000 Irrevocable Trust. All three resigned for various reasons related to actions by the contesting children and contesting bigamous spouse claimant and Pope. According to Pope, she first became involved in February 2007 as the result of a telephone call from Alan Medlin, who asked her to be considered as a nominee as Special Administrator. Medlin is an attorney for Hynie, who claims that she was James Brown's wife even though she was married at the time she married James Brown and who also contests the Trust and scholarship plan for needy children. The attorney for the other contesting children also supported Pope as someone who would go along with the family's plans for the estate - that she would be a rubber stamp for them. Pope had no experience serving as a fiduciary of a multi-million dollar estate, much less running a thriving entertainment company. Pope was ex parte appointed without a hearing. Pope, in true fashion, reciprocated her loyalty to those who supported her appointment. Although Pope filed a motion to determine that no probable cause existed to challenge the will, she refused to depose Hynie or any of the other challenging children. Furthermore, regarding the children's claims of undue influence and enforcement of the No Contest Clause, Pope testified, "[W]e did not want to be punitive to James Brown's beneficiaries." "I'm not sure how much I had it in my heart to enforce the *in terrorem* clause." Pope also refused to take the deposition of Dewain Herring, the attorney who prepared the will, in order to show that James Brown was not subject to undue influence. Pope, for all practical purposes, enhanced

the positions of the contesting parties and remained loyal.

Pope later lost the loyalty from the contesting children and Hynie. Pope, against the wishes of James Brown's children, former fiduciaries and entertainment industry experts, severely diluted the potential and continual scholarship revenue stream when she intentionally, unnecessarily and contrary to South Carolina probate code destroyed any chance of a James Brown museum by selling his most iconic personal memorabilia in order to divert money to herself, which she did. On November 14, 2007, Pope made a recommendation to the circuit court of how to go about a sale through Christie's auction house. The trial Court granted her request. The contesting children and Terry appealed the order and lost. On July 17, 2008, the Christie's sale grossed about \$770,000. From the net of about \$554,000, Pope paid herself \$306,000 and paid approximately \$172,000 to attorneys and accountants they had hired leaving \$76,000 to the estate and Trust. This spelled the end for Pope. She lost support from those to whom she owed for her appointment, and until the Christie's sale, to whom she had remained loyal.

On August 10, 2008, the parties seeking to set aside the will and irrevocable trust, along with the South Carolina Attorney General, entered into a compromise and settlement agreement. Under the terms of the agreement, the settling parties would jointly seek the removal of Pope and Buchanan as PR/Trustees and insert a new PR/Trustee chosen by them. The settling parties agreed to create a new trust called the James Brown Legacy Trust. Interests

in the Legacy Trust were divided as follows: 47.5% to a new charitable trust, 23.75% to Hynie and her son and 4.79% to each of the adult children who were settling parties. In May of 2009, the circuit court in Aiken County approved the settlement and removed Pope and Buchanan as PR/Trustees. In this settlement that initially included only the contesting children, Hynie and her son, McMaster chose another Trustee, Russell Bauknight, who was also proposed by Hynie's attorneys. Pope was angered and scorned that she was discarded and fought the settlement that did not include her and more than likely only because it did not include her. Pope appealed the settlement on grounds that the attorney general did not have the right to dismember James Brown's testamentary intent by entering into a settlement with the contesting children and Hynie.

On May 8, 2013, the South Carolina Supreme Court issued its final decision on the appeal of the settlement agreement in *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013). The South Carolina Supreme court held that the circuit court erred in approving the compromise agreement. *Id.* at 425, 754. The court found there was no reasonable basis for the undue influence claim asserted by the parties contesting James Brown's will, other than as a means to dismantle Brown's estate plan, and no reasonable basis to support a finding that the contesting parties had acted in good faith. *Id.* Regarding the positions of Pope and Buchanan as PR/Trustees, the South Carolina Supreme Court affirmed the circuit court's removal of Pope and Buchanan from their fiduciary positions. *Id.* at 450, 767. The South Carolina Supreme Court in *Wilson*

found the circuit court had cause to remove Pope and Buchanan because their removal was in the best interests of the estate. *Id.* The court noted that Pope and Buchanan sought \$5 million in fees for their services as fiduciaries for a relatively short interval of time. "In addition, [Pope and Buchanan] sought and obtained permission from the circuit court to sell iconic assets from Brown's estate in order to raise funds, and a large portion of the amount raised went first to pay [their] own attorney's fees. [Pope and Buchanan] also unsuccessfully attempted to sell Brown's GRAMMY award at auction . . . These actions and the extreme discord between the parties convince us that [Pope and Buchanan's] continued service as fiduciaries is not in the best interests of the estate." *Id.* at 448-449, 766-767. The South Carolina Supreme Court ordered the circuit court to review the propriety of all fees, including attorneys' fees and trustees' fees and to order all unearned fees or unapproved fees to be disgorged and returned to Brown's estate. *Id.* at 450, 767.

Ironically, Pope currently suggests a similar settlement only excluding Hynie. In a letter to the South Carolina Attorney General dated April 3, 2014 (Pet.App.72a-77a) Pope suggested a settlement plan to make copyright deals only with those not challenging the will and 2000 Trust, make agreements with non-presumed, DNA-proven children who will actively support the estate plan and have challenged Hynie's spouse status, contract with only half (or half +1) of the children, and only contract with those who accept reasonable offers. *Id.* However, while arguing standing in this matter as the proposed guardian ad litem for certain children

and alleged children Pope suggests the termination rights are held by the children, not the 2000 Trust. This would be in direct opposition to the idea of protecting the needy children who would be beneficiaries of the 2000 Trust which purportedly owns the copyrights. Pope is trying to argue both sides of the argument. When she wants to invoke empathy, she states that she is protecting the needy children of Georgia and South Carolina and claims the copyrights are owned by the 2000 Trust. Yet, in her Petition for Writ of Certiorari, Pope claims the federal copyrights are owned by the children in a veiled attempt to invoke standing before the Supreme Court of the United States.

Pope does not have standing to bring this case before this Honorable Court. Pope merely professes to be the "proposed" guardian ad litem ("GAL") "for identified and unidentified children and claimed children of the entertainer James Brown." All of James Brown's children for which Pope suggests she is the "proposed" GAL are of the age of majority and of sound mind. None of which have entered into attorney client relations with Pope. No court has ordered her to represent anyone's interests as GAL. In fact, additionally and contrary to what Pope proclaims are her "proposed" GAL clients, she fails to provide their full names. She alleges that incarcerated son (Michael) is her client, but he is actually represented by Mathew Bodman, Esq. She claims to represent James Curtis, who has not been DNA tested proving any patronage to the Estate of James Brown. The estate and issues of La Rhonda Pettit are represented by Ms. Vera Gilford. Finally, and in completely typical and ambiguous fashion she

claims to represent an unidentified "others" for whom she has failed to enlighten this Honorable Court, or anyone for that matter, as to their identities. None of the above mentioned parties or individuals have hired Pope regardless of whether any of the claims are timely or actionable.

Pope proposes standing as an "other" pursuant to 62-7-405 of the South Carolina Trust Code that allows the Attorney General and "others" to enforce charitable trusts. Pope only standing as an "other" is that she continues to fight for her \$5 million payment while serving as personal representative and trustee that she alleges she is owed cloaked by her claimed desire to help needy kids through the 2000 Trust. Pope's payment, if any, should be calculated on the estate valuation at the time she served as PR/Trustee. Since she argues herein standing as proposed GAL for copyright termination beneficiaries, she clearly takes the position that copyright terminations belong to James Brown's children, not the 2000 Trust. Therefore, by Pope's account, the value of the 2000 Trust should be made excluding the copyrights. Pope claiming to have standing as an "other" also implies that her standing will protect the Trust for the needy children. Pope currently is suing the Trust for \$5 million. That, in and of itself, is an inherent and non-waivable conflict of interest. On the one hand she claims to support the Trust, but wants to dictate an abusive, unwarranted, uncorroborated valuation to pay herself excessive fees that would dilute the scholarship pool.

**STATE OF SOUTH CAROLINA  
In the Supreme Court**

---

**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.

---

**AFFIDAVIT OF ADELE J. POPE IN SUPPORT  
OF EXPEDITING APPEAL**

---

PERSONALLY APPEARED BEFORE ME, ADELE J. POPE, who being duly  
sworn, deposes and says:

1. I am over 18 years old.

2. This affidavit is based on my personal knowledge.

3. I am informed and believe that this Court's granting my request to expedite the appeal of orders of the Honorable Doyet A. Early, III, (the "June 13 Orders" appeal), is just and necessary. I believe it is fair to me, and to the "I Feel Good" Foundation.

4. The brief filed with the United States Supreme Court on March 24, 2015 by Respondent Terry Brown (Terry) is one example of the venomous and false attacks which continue to be lodged against Robert Buchanan, Jr. and me by Terry and others after six years.

5. Claims by Terry and other disgruntled heirs of James Brown were an expected part of the assignment I accepted. James Brown expected them. Brown gave his Fiduciaries the tools to refute them.

6. The irreparable damage to my career and reputation is being caused, instead, by the State's support of the false and outrageous claims being made by Terry and Forlando Brown (Forlando); their former lawyer, David B. Bell; Ms. Hynie; and others seeking to dismember the "I Feel Good" Trust.

7. The AG's support for improper acts of Terry and others began on May 19, 2010, when the AG and his Legacy Trust became co-Plaintiffs with Terry in Case 4900. The AG's trustee, Russell Bauknight, also became the agent for Terry, Ms. Hynie and others.

8. The State's support for Terry and Forlando became more aggressive in December 2010 and January 2011 when AG McMaster, Terry, and others amended the AG's Legacy Trust, and Forlando received and began attempting to exercise the right of first refusal to purchase the music empire AG McMaster had given Terry.

9. It was during that two-month period that some of the most egregious false claims were planted. They included:

a. Terry and Forlando, with the AG, began their support for Bauknight's false claim to the IRS that Brown's music empire was worth only \$4.7 million. [All knew it to be false. Both Terry and Forlando had been part of the February and March 2008 TJBL, LLC letters of intent to buy the music empire for \$90 million - \$100 million. All had access to the 2006 \$42 million Royal Bank of Scotland (RBS) professional appraisal of the major royalties.]

b. The Kilpatrick Stockton (KS) website, while Bell, Forlando and a Sr. Assistant AG were having dealings with KS, was changed to add an inaccurate claim about the GRAMMY withdrawal from the July 2008 Christie's sale. [Robert Potter, Esq., a NY attorney with KS who was credited with the action in the post, reported to me later that he knew nothing of the post.]

c. Terry began supporting Bauknight's false claim to the IRS, and later the Supreme Court, that Brown's tangible personal property (TPP) was worth only \$.5 million, even though the Christie's sale – a fraction of the items – had generated more than that. And Terry had made a \$2 million offer for the TPP in 2008.

10. I am also concerned for the "I Feel Good" Trust and its 892 copyrights that Terry has told the U.S. Supreme Court that Judge Early's orders excluding heirs from the Hynie spousal cases and taking heir status from DNA-proven heirs are not final. I am concerned he asserts this has nothing to do with Federal Copyright Act Termination Rights. I am especially concerned since Attorney General Wilson's office has notified me AG Wilson will do nothing to seek reconsideration of Judge Early's order declaring Hynie to be Brown's spouse.

11. What Judge Early has done to damage the copyrights will become irreparable if someone who understands the Copyright Act termination rights provisions and is committed to protecting the "I Feel Good" Foundation does not act. Terry, aligned with Ms. Hynie and AG Wilson, in Case 4900, will not protect the "I Feel Good"

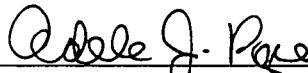
Trust.

12. While most statements in Terry's brief are false, and have no support in the record, they show how much damage the June 13 Orders and the AG's alliance with Ms. Hynie and Terry are causing Bob Buchanan, the "I Feel Good" Foundation, its 892 copyrights, and me.

13. When Terry repeatedly makes the known false claim that I am suing James Brown's estate for \$5 million – and has told this Court the entire estate was worth only \$5 million, but Terry was part of two \$90 - \$100 million offers to buy it – I do not believe his credibility should be bolstered by the AG.

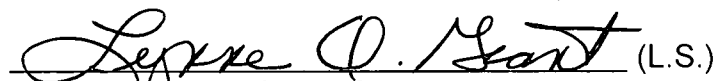
14. When Terry knows that David Bell, Esq. never sought or received *pro hac vice* permission to represent Brown's incarcerated son Michael, I do not believe the State should bolster Terry's false claim that Michael was Bell's client and did not need a GAL.

Respectfully submitted,



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

SWORN TO BEFORE ME this 26<sup>th</sup> Day of March, 2015

 (L.S.)  
Notary Public for South Carolina  
My Commission expires: 8-12-20

**STATE OF SOUTH CAROLINA  
In the Supreme Court**

---

**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.....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.

---

**PROOF OF SERVICE**

---

I certify that on the 26<sup>th</sup> day of March, 2015, I have served the MOTION TO EXPEDITE APPEAL AND MEMORANDUM IN SUPPORT OF EXPEDITED APPEAL AND AFFIDAVIT OF ADELE J. POPE IN SUPPORT OF EXPEDITING 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:

**ATTORNEYS OF RECORD FOR RESPONDENTS OR RESPONDENTS**

John A. Donsbach, Sr., Esquire  
Post Office Box 212139  
Martinez, GA 30917-2139

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

Eugene C. Covington, Jr., Esquire  
P. O. Box 2343  
Greenville, SC 29602

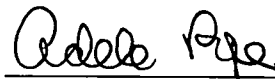
Robert N. Rosen, Esquire  
18 Broad Street, Suite 201  
Charleston, SC 29401

J. David Black, Esquire  
William W. Wilkins, Esquire  
William G. Newsome, Esquire  
PO Drawer 2426  
Columbia, South Carolina 29202-2426

Peter Shahid, Jr., Esquire  
89 Broad Street  
Charleston, South Carolina 29401

**OTHERS**

John F. Beach, Esquire  
Adams and Reese, LLP  
PO Box 2285  
Columbia, South Carolina 29202



---

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*

March 26, 2015