

**THE STATE OF SOUTH CAROLINA
IN THE Supreme COURT**

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**APPEAL FROM AIKEN COUNTY
Court of Common Pleas**

S.C. Supreme Court

**Doyet A Early, III, Circuit Court Judge
Case No 2008-CP-2-1647**

Alan Wilson, in his capacity as Attorney General of the State of South Carolina, Daryl J Brown, on behalf of his minor children, Lindsey B and Janise B , Deanna J Brown Thomas, on behalf of her minor child, Jason L , Yamma N Brown, on behalf of her minor children, Sydney L , Carrington L , and Tonya B , Vanisha Brown, Larry Brown, Tommie Rae Hynie Brown, and James B , through his Guardian ad Litem, Respondents,

v

Albert H Dallas, Alfred A Bradley, and David G Cannon, Individually and as (purported) Trustees of the James Brown 2000 Irrevocable Trust, Adele J Pope and Robert L Buchanan, Jr , Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust, Terry Brown, Romunzo Brown, Forlando Brown, Cinnamon N M Paris, LaRhonda Petitt, Jeanette Mitchell, and Russell L Bauknight, as Special Administrator and Special Trustee for The Estate of James Brown and The James Brown 2000 Irrevocable Trust,

of whom Robert L Buchanan, Jr , and Adele J Pope, as Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust are, Appellants,

and Albert H Dallas, Alfred A Bradley, and David G Cannon, Individually and as (purported) Trustees of the James Brown 2000 Irrevocable Trust, Terry Brown, Romunzo Brown, Forlando Brown, Cinnamon N M Paris, LaRhonda Petitt, Jeanette Mitchell, and Russell L Bauknight, as Special Administrator and Special Trustee for The Estate of James Brown and The James Brown 2000 Irrevocable Trust are Respondents

In re The Estate of James Brown and The James Brown 2000 Irrevocable Trust u/a/d August 1, 2000

**RECORD ON APPEAL
Volume VII
(Pages 2777-2909)**

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14	Affidavit of Buchanan/Pope in Support of Injunction and Damages for Intentional Interference dtd 2/5/09	2108
	Exhibit A Ltr of McMaster to Buchanan/Pope dtd 7/30/08	2112
	Exhibit B Chart 1 - James Brown's <u>Intentions</u> in his Last Will and Testament (2/09)	2114
	Exhibit C Chart 2 - James Brown INTENTIONS in his <u>1999</u> Will and Trust (2/09)	2115
	Exhibit D Chart 3- How the Proposed "Settlement" Destroys/Ignores James Brown's Intentions (2/09)	2116
	Exhibit E Chart 4 - What the "Settling" Parties would get if they set aside James Brown's Intentions in his 2000 & 1999 Wills/Trusts (2/09)	2117
	Exhibit F See Advisory Board document dtd 8/1/2000	1004
	Exhibit G Article dtd 10-03-02 re Daughters D Thomas and Y Lumar suing their Brown	2119
	Exhibit I See Order of Dismissal, Brown v Ahmed Brown	190
	Exhibit J See Death Certificate, James Joseph Brown, 12/25/06	541
	Exhibit K See Appointment/Acceptance Deanna as Trustee	682

	Exhibit L See Developing the James Brown Legacy, June 2007	462
	Exhibit M Powell Goldstein, \$48,225 Reminder Statement	2120
	Exhibit N Excerpts, Deposition of D Thomas, 10/31/07, Case 122	2121
	Exhibit Q Email of Toby Byron to Pope/Buchanan Ags, 11/28/07	2125
	Exhibit R Email Chain dtd 11/26-27/07, Cox, Heflin and others re JB Project, with Handwritten notes	2126
	Exhibit EE	
	(I) Ltr of Estate/Trust to Carter/Medlin dtd 2/02/09 Re Issues Related to Developing "Transition Plan"	2127
	(II) Ltr of Carter to Buchanan/Pope dtd 2/02/09	2129
	(III) Ltr of Estate/Trust to McMaster dtd 2/06/09 Re Estate/Trust Concern regarding Attorneys' Fees	2131
16	Joint Affidavit of Buchanan/Pope, dtd 2/19/09	2134
	Exhibit A Email Jones to Jg Early dtd 2/18/09	2140
	Exhibit B	
	(i) Ltr Of Buchanan/Pope to McMaster dtd 6/13/08 w/ annotated attachments	2141
	(ii) Hammond email to Buchanan/Pope dtd 6/21/07	2150
	(iii) Pope email to Hammond, dtd 6/18/07	2151
	(iv) Stipulation, Case 122 dtd 9/24/07	2153
	(v) Affidavit Phillip G Farr, CPA dtd 9/24/07	2160
	(vi) Email, Hammond to Jones and Lewis dtd 9/27/07	2161
	(vii) Emails, Hammond, Lewis dtd 11/1/07	2166
	(viii) Email chain, Babcock, Hammond, Buchanan/Pope dtd 6/18 -21/07	2167
	(ix) Email Cox, Heflin ,Alvin Calvin to Pope dtd 11/28-30/07	2170

	(x) Email Hammond to Lewis, Jones dtd 11/27/07	2171
	(xi) Email Jones to Hammond dtd 11/27/07	2172
	(xii) Jones email to Buchanan/Pope dtd 12/6/07	2174
	(xiii) Ltr The James Brown Legacy, Inc (name pending) to Dallas dtd 10/12/07	2175
	(xiv) See Ltr Terry B , TJBL to Buchanan/Pope dtd 3/27/08	484
	(xv) Email Jones to Hammond dtd 12/14/07 re Brown Conflict of Interest	2177
	(xvi) WISTV com report, Forlando B , McMaster appearance on WIS TV, 2/7/08	2180
	(xvii) Excerpt, 3/7/07 Hearing, Case 122	2182
	(xviii) Motion of Dallas/Bradley to Declare JBE, Inc Asset of the Estate and Not of the Irrevocable Trust dtd 8/31/07, Case 122 w/ JBE, Inc Tax Returns and other attachments	2189
	(xix) Minutes of Mtg of Directors, JBE, Inc held 8/27/01	2214
	(xx) Minutes, Mtg of Directors JBE, Inc , Resolution, dtd 9/26/00	2215
	(xxi) First Semi- Annual Report of PR/Trustees to Devisees, Beneficiaries and AG, dtd 5/20/08	2219
	Ex 1 - Proposed "Gross" Sale of Assets	2226
	Ex 2 - Claims by former PR/Trustees	2227
	Ex 3 - Pyts , Bill & Claims presented by Attys , Accountants for former PR/Trustees for services from Death - 11/30/07	2228
	Exhibit C See Ltr McMaster to Buchanan/Pope dtd 7/30/08	2112
	Exhibit D See Excerpts, Transcript, Hg 6/30/08, Case 122	2051
17	Affidavit of Pope Opposing Removal of PR/Trustees, Denying Emergency, Supporting Stay and Proper Joinder, Supporting Proper Notice of Hearings, Supporting Order Compelling Parties to Appear with Records to Testify, and Seeking Court Ruling under S C Trust Code Section 62-7-932(D) Related to	

	Principal & Income Charges under Will/Trust <i>In Terrorem</i> Clauses, dtd 2/23/09	2229
	Exhibit A Ltr Buchanan/Pope to McMaster dtd 3/10/08	2248
	Exhibit B Ltr Buchanan/Pope to McMaster, Staff dtd 3/13/08	2251
	Exhibit C Emails Cannon, Walt Inabinet dtd 10/27-28/07	2254
	Exhibit D Cox, Heflin, Alvin Calvin to Pope emails 11/28-30/07	2256
	Exhibit E Hammond, Jones emails 11/24/07	2257
17	Affidavit of Dallas, dtd 3/24/09	2258
19	Joint Affidavit of Buchanan/Pope, dtd 4/2/09	2260
	Ex A Documents from F Brown Federal Suit	
	(i) Memorandum (Buchanan/Pope) in Support of Motion to Lift Stay of Briefing Schedule, dtd 2/27/09	2266
	(ii) Motion to Lift Stay of Briefing Schedule dtd 2/27/09	2269
	(iii) Defendants' Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction and Permanent Injunction	2271
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	Ex B "Superman's Last Episode" by Peter Afraslabi	2308
	Ex C See Ltr of McMaster to Buchanan/Pope dtd 7/30/08	2112
	Ex D See WIS News 10 Report, F Brown, McMaster 2/7/08	2180
	Ex E	
	(i) Ltr Lance D Lourie, Esq to Clerk, U S Dist Ct , ND, Atlanta Div , dtd 10/13/03 Re <i>Deanna Yamma Publishing Company, Inc v James Brown et al</i> , U S District Court Civil Action No 1 02 -CV-2353-HTW	2315
	(ii) Ltr Leon Friedman, Esq to Ernst & Young dtd 10/27/03	2316
	(iii) Ltr Leonard F McIntyre to Buchanan/Pope dtd 3/24/09 re Trust Advisory Board	2319

	(iv) Ltr Walter F Williams, Jg (Ret) to Buchanan/Pope dtd 3/27/09 re Trust Advisory Board	2320
	(v) Ltr Larry Campbell to Buchanan/Pope dtd 3/17/09	2321
	Ex H	
	(i) See Ltr Buchanan/Pope to Carter/Medlin dtd 2/2/09	2129
	(ii) Ltr Bailey to Jg Early dtd 2/16/09 re McMaster v Dallas	2322
	(iii) Ltr Bailey to Jg Early dtd 3/10/09 re Case 1647, Case 122, Case 872	2327
	(iv) Ltr of PR/Trustees to Medlin, Carter, McMaster dtd 3/11/09	2331
	(v) Ltr of Pope to McMaster dtd 3/12/09	2333
	(vi) Ltr of Buchanan/Pope to IRS dtd 12/11/07 re Estate, Trust, JBE, Inc , JB, LLC	2335
	(vii) Ltr of Buchanan/Pope to Rick Handel, Esq, SCDOR, dtd 12/11/07 re Estate, Trust, JBE, Inc , JB, LLC	2338
	(viii) Ltr of Buchanan/Pope to McMaster dtd 3/16/09	2341
	(ix) Ltr of Bailey to Jg Early dtd 3/18/09	2343
	(x) Ltr of Bailey to Jg Early dtd 3/23/09 re McMaster v Dallas	2345
	(xi) Ltrs of Stewart (IRS) to Buchanan/Pope/Sellars dtd 3/24/09	2349
	(xii) Ltr of Buchanan/Pope to McMaster dtd 4/1/09 enclosing Stewart letters	2354
	(xiii) Ltr of Art Gold, Esq to McMaster, Buchanan, Pope dtd 4/2/09 re Brown v CORBIS	2356
20	Affidavit of Jay B Ross, Esq , dtd 3/19/09	2358
24	Agreement dtd 8/10/08, with Addendum and attachments, filed 3/26/09	2362
25	Affidavit of Buchanan/ Pope supporting Summary Judgment, dtd 4/28/08	2495
	Exhibit C Ltr of Buchanan/Pope to McMaster & others, 4/10/09	2498

26	Affidavit of Adele J Pope, dated May 15, 2009	2500
	Exhibit A See Certificate of Organization, TJBL, LLC	1090
	Exhibit B See Ltr to The James Brown Legacy, Inc (name pending) to Dallas dtd 1/12/07	2175
	Exhibit C Dallas Law Firm email from Cox to Jones and Lewis dtd 1/21/08 re Projected Trust Royalty	2504
	Exhibit D See Letter of Intent TJBL, Inc dtd 3/27/08	487
	Exhibit E See Offer Terry B And TJBL dtd 3/27/08	484
27	Joint Affidavit of Buchanan/ Pope related to commissions and expenses, dtd 6/24/09	2505
	Exhibit A Ltr of Buchanan/Pope to Bauknight dtd 6/17/09	2511
28	Supplemental Affidavit of Buchanan/Pope, dtd 6/13/09 List of Exhibits 1 through 18	2513 2569
29	Affidavit of Pope, dtd 7/17/09	2570
30	Affidavit of Pope Supporting Ruling or Holding All Except Current Judgment in Abeyance Pending Appeal, dtd 7/20/09	2604
	Affidavit of W Steven Johnson, dtd 7/20/09	2615
31	Affidavit of Buchanan/Pope, dtd 10/14/09	2620
b	AFFIDAVITS AND OTHER - CASE 1810	
1	Affidavit of Pope Opposing Hearing Without Proper Notice, Requesting Due Process Notice and Hearing, and Confirming that No Emergency Exists, dated August 24, 2009, with the following Exhibits	2627
a	Copy of Probate Code Section 62-1-308, Appeals	2635
b	Letter of Jowers to Clerk of Court, dtd 8/21/09, with proposed Order	2636
2	Letter of Jones to the Clerk of Court, dtd 7/30/09	2639
c	AFFIDAVITS AND OTHER - Miscellaneous	
1	Prenuptial Agreement of Brown and Hynie dtd 6/19/2000	2641

2	Brief of Respondents Buchanan/Pope, Dallas/Bradley Appeal	2652
3	Initial Reply Brief of Appellant, Cannon Appeal	2704
4	Ltr of Levenson to Thurmond, Massey dtd 1/18/07	2716
5	Affidavit of Yamma Lumar dtd 1/18/07	2719
6	Affidavit of Deanna Thomas dtd 1/18/07	2722
7	Affidavit of Daryl Brown dtd 1/18/07	2725
8	Signed deed w/o description, Herring file	2728
9	Accounting of James Brown Estate 5/28/09-12/31/09	2732
10	Accounting of James Brown Estate 11/20/07-5/20/09	2741

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11	Accounting of James Brown Estate 5/21/09-5/27/09	2777
12	Notice of Creditor's Claim (Fee Petition), Buchanan/Pope dtd 7/17/09	2879
13	See Marriage License and Certificate of Brown and Hynie	970
14	See Stipulation regarding Trust Assets	2153
15	See Affidavit of Ann Carmichael	1006
16	See Affidavit of Walter Williams	1005
17	See Affidavit of Coach Larry Campbell	1007
18	Response to Requests to Admit dtd 8/27/08, Case 872	2883
19	Amended Complaint, Brown vs Ahmed Brown	2887
20	Answer and Counterclaim, Brown vs Ahmed Brown	2893
21	Reply, Brown vs Ahmed Brown	2899
22	Excerpts, Brown Biography	2903

**STATE OF SOUTH CAROLINA
COUNTY OF AIKEN**

PROBATE COURT

**IN THE MATTER OF ESTATE OF JAMES BROWN
CASE NUMBER 2007-ES-02-0056**

ACCOUNTING

**[X] FINAL (RESERVING ALL RIGHTS)¹
[] INTERIM #**

The undersigned Personal Representatives submit this Final Accounting, which covers the period from May 21, 2009, through May 27, 2009, and relates to the assets of the Estate of James Brown and the James Brown 2000 Irrevocable Trust

The attached documentation sets forth a complete accounting for the period specified, which is summarized as follows

	Income	Principal	Total*
Beginning Balance		\$ 99,863,015 02	
Plus Receipts		\$ 2,338,393 75	
Subtotal		\$ 102,201,408 77	
Less Disbursements		\$(102,201,408 77)	
Ending Balance in hands of Buchanan and Pope		\$ 0*	

*If a consolidated accounting, use this column

The Personal Representatives declare that this account has been examined and that its contents represent a correct statement of all receipts and disbursements and are true to the best knowledge and belief of the Personal Representatives

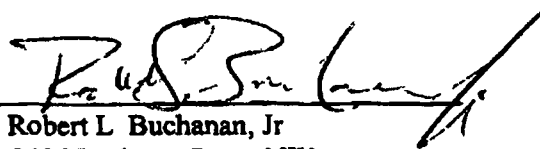
FORM #360PC (7/87)
SCPC 3-704, 3-1003

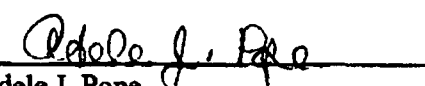
PAGE 1 OF 2

¹ \$99,860,509 21 was delivered to Russell L. Bauknight, reserving all rights pursuant to the appeal of this Court's Termination of Appointment dated May 26, 2009 and all objections and reservations to the Order of the Honorable Doyet A. Early, III, dated May 26, 2009

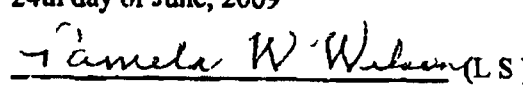
Filed: 6-24-2009
Sue H. Roe
Judge of Probate
By: S. Rudy

JUN 29 2009

Signature 
Name Robert L. Buchanan, Jr
Address 212 Newberry Street NW
P O Box 463
Aiken, South Carolina 29802-0463
Telephone(O) 803-649-2586

Signature 
Name Adele J. Pope
Address 1218 Taylor Street
PO Drawer 7125
Columbia, SC 29202-7125
Telephone(O) 803-779-1870

SWORN to before me this
24th day of June, 2009

 (L.S.)
Notary Public for South Carolina
My Commission Expires 04 03 2012

**ATTACHMENT TO FINAL ACCOUNTING
ROBERT L BUCHANAN, JR. AND ADELE J POPE, AS PERSONAL
REPRESENTATIVES OF THE ESTATE OF JAMES BROWN AND TRUSTEES OF
THE JAMES BROWN 2000 IRREVOCABLE TRUST**

DATE	DESCRIPTION	RECEIPTS	DISBURSEMENTS
5/21/09	To Show Assets at beginning of period		
	1 Security Federal Account #408015768	\$ 14,837 78	
	2 430 Douglas Drive, Beech Island, South Carolina Estate [owned by 2000 Trust]	\$ 1,215,000 00	
	3 Personal and Household Effects ("PHE") devised under Article I of Will, and/or proceeds	\$ 425,053 00	
	4 Remaining Tangible Personal Property ("TPP"), including TPP on loan to S C State University, Lucy Craft Laney Museum of Black History, Augusta Museum of History, SC State Museum, masters, etc located in secure storage, and automobiles	\$ 1,574,947 00	
	5 Note, Security Deed, JJ Brown House sale	\$ 54,000 00	
	6 Remaining assets ¹	\$ <u>96,579,177.24</u>	
	Total Value, Beginning Assets	\$ 99,863,015 02	
	Less Secured Claims, etc		
	1 TIAA Royalty Debt		\$ 13,165,163 25
	2 Priority loan from TIAA/M&T, Trustee		\$ 100,000 00
	3 Other claims, including Debts and disputed claims at nominal carrying value ²		\$ 1 00
	Total Debts listed above		\$ <u>13,265,164.25</u>
	NET VALUE OF BEGINNING ASSETS	\$ 86,597,850 77	

¹ Residue of assets including those owned by estate, trust & other James Brown entities including but not limited to royalty interests, image, persona, Publicity Rights, licenses & other related rights including rights owned by Geronimo, LLC, James Brown d/b/a The New James Brown Enterprises, Inc Also including but not limited to rights and claims against former PRs/Trustees, Seventh Decade and/or others for losses during the period prior to the death of James Brown Also includes GG Contract and Soundexchange Contract Assets may be owned within James Brown Enterprises, Inc (JBE, Inc), James Brown LLC or another Brown Entity

² See list of Status of Claims attached to Interim Accounting 1A covering the period through May 20, 2009

JUN 29 2009

DATE	DESCRIPTION	RECEIPTS	DISBURSEMENTS
	Beginning Assets as shown above \$99,863,015 02	\$ 99,863,015 02	
5/22/09	D Washington - w/e 5/23/09 (Ck #1436)		\$ 494 81
5/22/09	David Washington - mileage (Ck #1437)		\$ 100 00
5/22/09	Lisa Hicklin - transcripts for hearings 3/4-3/6/09 (Ck #1438)		\$ 1,911 00
5/22/09	Royalties received through May 26, 2009 inclusive of earnings	\$ 2,338,393 75	
5/22/09	Royalties applied to TIAA debt as follows Principal \$1,776,883 24 Interest \$ 561,510 51		\$ 2,338,393 75
5/27/09	To show assets transferred (RESERVING ALL RIGHTS) to Russell L. Bauknight on May 27, 2009		
	1 Security Federal Account #408015768		\$ 12,331 97
	2 430 Douglas Drive, Beech Island, South Carolina Estate [owned by 2000 Trust]		\$ 1,215,000 00
	3 Personal and Household Effects ("PHE") devised under Article I of Will, and/or proceeds		\$ 425,053 00
	4 Remaining Tangible Personal Property ("TPP"), including TPP at I P Stanback Museum and Planetarium, S C State University, TPP on loan to Lucy Craft Laney Museum of Black History, TPP on loan to Augusta Museum of History, TPP on loan to South Carolina State Museum, masters, etc located in secure storage, and automobiles		\$ 1,574,947 00
	5 Note, Security Deed, JJ Brown House sale		\$ 54,000 00
	6 Remaining assets as described above		\$ 96,579,177 24
	Total value, assets transferred \$99,860,509 21		
5/27/09	To show assets remaining in hands of Buchanan and Pope as PR/Trustees	\$ 0.00	\$ 0.00

JUN 29 2009

DATE	DESCRIPTION	RECEIPTS	DISBURSEMENTS
	TOTAL	\$ 102,201,408 77	\$ 102,201,408 77
	Less Secured Claims, etc .		
1	TIAA Royalty Debt	\$ 11,388,280 01	
2	Priority loan from TIAA/M&T, Trustee	\$ 100,000 00	
3	Other claims, including Debts and disputed claims at nominal carrying value ³	\$ 1 00	
	Total Debts listed above	\$ 11,488,281 01	
	NET VALUE OF TRANSFERRED ASSETS	\$ 88,372,228 20	

*Also see the following exhibits

Exhibit 1 - Summary of Accountings of Buchanan and Pope

Exhibit 2 - Custody Receipt for books and records transferred (**without prejudice**) to Russell L. Bauknight in connection with (temporary) management of Estate and Trust on or before June 23, 2009

³ See list of Status of Claims attached to Interim Accounting 1A covering the period through May 20, 2009

EXHIBIT 1
SUMMARY OF ACCOUNTINGS OF BUCHANAN AND POPE, ESTATE OF JAMES
BROWN AND JAMES BROWN 2000 IRREVOCABLE TRUST

Assets at Beginning of Period (11/20/07)	\$	100,000,000 00
Less Secured Claims, Etc	\$	(17,026,624 18)
1 TIAA Royalty Debt		
2 Priority loan from TIAA/M&T, Trustee	\$	(100,000 00)
3 Other claims, including Debts and disputed claims at nominal carrying value	\$	(1 00)
Net Value of Beginning Assets	\$	82,873,374 82
 Assets at End of Period (5/26/09)	 \$	 99,860,509 21
Less Secured Claims, etc		
1 TIAA Royalty Debt	\$	(11,388,280 01)
2 Priority loan from TIAA/M&T, Trustee	\$	(100,000 00)
3 Other claims, including Debts and disputed claims at nominal carrying value	\$	(1 00)
Net Value of Ending Assets	\$	88,372,228 20

**CUSTODY RECEIPT
DOCUMENTS OF ESTATE OF JAMES BROWN AND
THE JAMES BROWN 2000 IRREVOCABLE TRUST**

Without prejudice to the position of either party as to rights to ownership or custody on behalf of the Estate of James Brown and/or The James Brown 2000 Irrevocable Trust, the undersigned acknowledge the transfer of custody to Russell L Bauknight on or before June 22,¹ 2009, of the boxes listed below

BOX 1 - FORMERLY CANNON BOX 1

This is one of many boxes delivered to 1218 Taylor Street, Columbia, pursuant to Order of the Honorable Doyet A Early, III, dated August 10, 2007. These documents were maintained until August 2007 by David G Cannon, who resigned as PR/Trustee on August 10. Custody and control of the boxes remained with Albert H Dallas and Alfred A Bradley, the remaining PR/Trustees, until their resignations on November 20, 2007. Since November 20, 2007, the boxes have been, under various Orders, reviewed by interested parties and counsel, counsel for the PR/Trustees, counsel for the former PR/Trustees, and opposing counsel in litigation. 1218 Taylor Street was considered the "Reading Room" in various confidentiality agreements in various cases.

[If requested, we will be glad to discuss this matter at a weekly meeting]

BOX 2 - FORMERLY CANNON BOX 2

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 1.

BOX 3 - FORMERLY CANNON BOX 3

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 1.

BOX 4 - FORMERLY CANNON BOX 4

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 1.

BOX 5 - FORMERLY CANNON BOX 5

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 1.

Filed 6-24-2009

Sue H Roe
Judge of Probate

By S. R. Rody

¹ Boxes 1-83 previously delivered. See Receipts dated May 27, 2009 and May 29, 2009.

- BOX 6 - FORMERLY CANNON BOX 6**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 7 - FORMERLY CANNON BOX 7**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 8 - FORMERLY CANNON BOX 8**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 9 - FORMERLY CANNON BOX 9**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 10 - FORMERLY CANNON BOX 10**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 11 - FORMERLY CANNON BOX 11**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 12 - FORMERLY CANNON BOX 12**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 13 - FORMERLY CANNON BOX 13**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 14 - FORMERLY CANNON BOX 14**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009

See Comments to Box 1

BOX 15 - FORMERLY CANNON BOX 15

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 16 - FORMERLY CANNON BOX 16

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 17 - FORMERLY CANNON BOX 17

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 18 - FORMERLY CANNON BOX 18

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 19 - FORMERLY CANNON BOX 19

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 20 - FORMERLY CANNON BOX 20

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 21 - FORMERLY CANNON BOX 21

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

BOX 22 - FORMERLY CANNON BOX 22

Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
See Comments to Box 1

- BOX 23 - FORMERLY CANNON BOX 23**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 24 - FORMERLY CANNON BOX 24**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 25 - FORMERLY CANNON BOX 25**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 26 - FORMERLY CANNON BOX 26**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 27 - FORMERLY CANNON BOX 27 (Small Box)**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 28 - FORMERLY CANNON BOX 28**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 29 - FORMERLY CANNON BOX 29**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 30 - FORMERLY CANNON BOX 30**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009
 See Comments to Box 1
- BOX 31 - FORMERLY CANNON BOX 31**
 Delivered to 1218 Taylor Street by Mr Cannon in August, 2007 pursuant to Order
 dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009

See Comments to Box 1

BOX 32 - FORMERLY 7TH DECADE BOX 15a

BOX 33 - FORMERLY 7TH DECADE BOX 15b

BOX 34 - FORMERLY 7TH DECADE BOX 15c

BOX 35 - FORMERLY LEWIS & BABCOCK BOX 1

These documents were maintained by Lewis & Babcock law firm, attorneys for PR/Trustees Cannon, Dallas and Bradley until August 10, 2007, and for remaining PR/Trustees Dallas and Bradley until November 20, 2007. The documents were delivered to 1218 Taylor Street between August 13 and August 24, 2007, pursuant to Court Order dated August 10, 2007. They remained under the control of Dallas and Bradley until their resignations on November 20, 2007. A list of the L & B index to the boxes is attached to this receipt as Exhibit A.

BOX 36 - FORMERLY LEWIS & BABCOCK BOX 2

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 35.

BOX 37 - FORMERLY LEWIS & BABCOCK BOX 3

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 35.

BOX 38 - FORMERLY LEWIS & BABCOCK BOX 4

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 35.

BOX 39 - FORMERLY LEWIS & BABCOCK BOX 5

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 35.

BOX 40 - FORMERLY LEWIS & BABCOCK BOX 6

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122. Delivered to Mr Bauknight on May 29, 2009. See Comments to Box 35.

- BOX 41 - FORMERLY LEWIS & BABCOCK BOX 7**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 42 - FORMERLY LEWIS & BABCOCK BOX 8**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 43 - FORMERLY LEWIS & BABCOCK BOX 9**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 44 - FORMERLY LEWIS & BABCOCK BOX 10**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 45 - FORMERLY LEWIS & BABCOCK BOX 11**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 46 - FORMERLY LEWIS & BABCOCK BOX 12**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 47 - FORMERLY LEWIS & BABCOCK BOX 13**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 48 - FORMERLY LEWIS & BABCOCK BOX 14**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 49 - FORMERLY LEWIS & BABCOCK BOX 15**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29,

2009 See Comments to Box 35

- BOX 50 - FORMERLY LEWIS & BABCOCK BOX 16**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 51 - FORMERLY LEWIS & BABCOCK BOX 17**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 52 - FORMERLY LEWIS & BABCOCK BOX 18**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 53 - FORMERLY LEWIS & BABCOCK BOX 19**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 54 - FORMERLY LEWIS & BABCOCK BOX 20**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 55 - FORMERLY LEWIS & BABCOCK BOX 21**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 56 - FORMERLY LEWIS & BABCOCK BOX 22**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 57 - FORMERLY LEWIS & BABCOCK BOX 23**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

- BOX 58 - FORMERLY LEWIS & BABCOCK BOX 24**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 59 - FORMERLY LEWIS & BABCOCK BOX 25**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 60 - FORMERLY LEWIS & BABCOCK BOX 26**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 61 - FORMERLY LEWIS & BABCOCK BOX 27**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 62 - FORMERLY LEWIS & BABCOCK BOX 28**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 63 - FORMERLY LEWIS & BABCOCK BOX 29**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 64 - FORMERLY LEWIS & BABCOCK BOX 30**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 65 - FORMERLY LEWIS & BABCOCK BOX 31**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 66 - FORMERLY LEWIS & BABCOCK BOX 32**
Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29,

2009 See Comments to Box 35

BOX 67 - FORMERLY LEWIS & BABCOCK BOX 33

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 68 - FORMERLY DALLAS BOX 1

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 69 - FORMERLY DALLAS BOX 2

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 70 - FORMERLY DALLAS BOX 3

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 71 - FORMERLY DALLAS BOX 4

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 72 - FORMERLY DALLAS BOX 5

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 73 - FORMERLY DALLAS BOX 6

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

BOX 74 - FORMERLY DALLAS BOX 7

Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35

- BOX 75 - FORMERLY DALLAS BOX 8**
 Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 76 - FORMERLY DALLAS BOX 9**
 Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 77 - FORMERLY DALLAS BOX 10**
 Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 78 - FORMERLY DALLAS BOX 11**
 Delivered to 1218 Taylor Street by Lewis & Babcock in August, 2007 pursuant to Order dtd August 10, 2007 in Case 122 Delivered to Mr Bauknight on May 29, 2009 See Comments to Box 35
- BOX 79 - MORGAN STANLEY BOX 13a**
- BOX 80 - TAXES BOX**
- BOX 81 - CORBIS LITIGATION BOX**
- BOX 82 - ADMINISTRATION BOX with following sub-files**
 2008 and 2009 SF Statements
 David Washington
 Enterprise Bank
 Old Unpaid Bills
 WAMU Investments
 Bank of America
 Sizemore Visitor Log
 Miscellaneous
 Sizemore Security
 Cruise Security
 State Farm Auto
 IRS Documents
 Estate Tax Return
 Probate Docs
 Hogan and Hartson bills
 Miscellaneous Checks

Iron Mountain
House Maintenance
Sellars and Cole
Attorneys' fees paid
Beech Island Water
SCE & G
AT & T
Deposits

BOX 83 - CLEARANCES/PROPOSAL BOX with following sub-files

YoHa Technology - Kenneth Chin
Carlin International - Conlin
Ray Gonzalez/TV Special
Contract Authorization
Compulsory Licenses Notice
Slackers, Inc Proposals
Global Gaming
Llewellynn M Dykes - Master Appraiser
Warner/Chappell-Marjorie Schecker
Warner/Chappell- Laura Masseria
Warner/Chappell- Brian Cherchiglia
Jennifer Lamping/Gonzalez Agreement
Warner/Chappell- Timothy Kane
Warner/Chappell- Cecilia Harvey
Warner/Chappell- Winifred Jow
Warner/Chappell- Pat Woods
Warner/Chappell- Deborah Keegan
Warner/Chappell- Claudia Lyon
Warner/Chappell- Dave Pettigrew
Warner/Chappell- Steve Barton
Carlin International - Rogoff
Warner/Chappell- Paulette

✓ **BOX 84 - (formerly 14A) TANGIBLE PERSONAL PROPERTY ("TPP")**
Christie's materials

✓ **BOX 85 - (formerly 14B) TANGIBLE PERSONAL PROPERTY ("TPP")**
Museums Also see CDs

✓ **BOX 86 - (formerly 14C) TANGIBLE PERSONAL PROPERTY ("TPP")**
TPP Notebooks - The notebooks are part of an inventory prepared by Tom Wells, Thompson, Ga engaged by the Cannon Group after James Brown's death A Wells notebook is part of the Inventory & Appraisement (I&A) filed by Dallas & Bradley on

November 15, 2009 In the late fall of 2007, when Buchanan & Pope were SA s, Mr Dallas informed them that Mr Wells would complete his work on the inventory for \$10,000 (in addition to the amounts they had earlier paid him) See pleadings, motions, etc in Case 122 for details of the controversy surrounding the valuation and protection of the TPP in October/November 2007

[If requested, we will be glad to discuss this matter at a weekly meeting]

✓ **BOX 87 - 2000 TRUST INCLUDING "I FEEL GOOD" ADVISORY BOARD, ORIGINAL DOCUMENTS, ETC**

Miscellaneous Matters re 2000 Trust, including the following subfiles

Advisory Board file and confirmation of Requests to Serve
The James Brown "I Feel Good" Trust correspondence

Application for Recognition, "I Feel Good" Trust NOTE Contains Post-Death
Dallas-created Schedule B Mr Dallas give this to the accountant This error was
corrected by the accountant as soon as discovered

Correspondence with David Bell and others re scholarships

Scholarship Application Form
ByLaws of The James Brown "I Feel Good" Trust
Amendments and Ratification of Amendments and other Actions, James Brown 2000
Irrevocable Trust dtd July 28, 2008 (Incorporating various actions prior to that time)

Advisory Board Red Rope
Correspondence
Confirmation of Request to Serve

"I Feel Good" Trust Red Rope
Request for Disbursements for Education
"I Feel Good" Trust Amendments/Resolutions
"I Feel Good" Trust Tax materials
Herring Estate Planning

Red Rope - almost no contents, Irrevocable Trust of James Brown, SouthTrust Bank
Red Rope - James Brown Regions, containing statements from 2000

1 Probate Pleadings Notebook, containing

- | | | |
|---|---------|--|
| 1 | 4/16/07 | Petition for Accounting |
| 2 | 4/16/07 | Motion for Removal of Petition for Accounting to Circuit Court |

3	4/16/07	Affidavit of Tommie Rae Brown
4	4/18/07	Affidavit of Stephen M Slotchiver
5	4/20/07	Return to Petition for Guardian Ad Litem
5a	4/24/07	Memorandum in Support of Petitioner's Motion to Appoint a Guardian <i>Ad Litem</i> W/cos to Court of Common Pleas
6	4/26/07	Order for Removal to the Court of Common Pleas
7	6/25/07	Demand for Notice by Guardian Ad Litem for James B [REDACTED]
8	6/25/07	Election by Pretermitted Child to Claim a Share of Estate Pursuant to Section 62-2-302
9	6/26/07	Objection to Estate's Request for an Extension to File Inventory and Appraisement from Stephen M Slotchiver- Guardian Ad Litem
10	6/27/07	Objection to Estate's Request for an Extension to File Inventory and Appraisement by Brown Children W/ Cos
11	6/28/07	Amended Motion to Acquire and Test Dna Samples W/cos
12	8/13/07	Memo of David G Cannon Re Resignation as Personal Representative from the Estate of James Brown W/cos
12a	8/14/07	Stephen M Slotchiver, as Guardian <i>Ad Litem</i> , Response to Amended Motion to Acquire and Test DNA Samples W/ Cos
13	8/21/07	Petition for Adjudication of Paternity
14	9/6/07	Order in Re David Cannon's Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production
15	9/20/07	Notice of Appearance of Stephen L Brown and Robin G Poliakoff of Young Clement Rivers, LLP
16	9/20/07	David Cannon's Return to Motion for Accounting and Motion for Attachment
17	9/20/07	Return to Petition for Determination of Paternity
18	11/06/07	Demand for Notice Re Velma Warren Brown from David B Bell
19	12/04/07	Return of Attorney General Thurbert E Baker to Claim of James J Brown II's Claim to a Share of the Estate
20	12/5/07	Return to Petition for Adjudication of Paternity W/cos
21	Undated	Proposed Order for Removal of Tommie Rae Brown's Petition for Appointment of Guardian <i>Ad Litem</i> to the Court of Common Pleas
22	Undated	Proposed Application for Extension for Inventory and Appraisement
23	Undated	Petition for Adjudication of Paternity
24		Consent Order (Regarding Petitioner's Personal Property)
25		Confidentiality/protective Order
22		Proposed Consent Order (Regarding Petitioner's Personal Property)
23		Proposed Confidentiality/protective Order

This box also contains a small box containing various documents, including Title to 1998

Lincoln, Lin Broadcasting Corporation stock certificate, correspondence from Jay Ross, petition in case of Michael Deon Brown, Plaintiff, v James Brown, Sacramento County, CA Superior Court Action, Royalty statements from 1990, Hello Grandfather letter from Romunzo Brown dated April 28, 2004, Plaintiff's memorandum in James Brown v AC & R Advertising Inc , and other important documents

✓ **BOX 88 - CANNON/DALLAS/MORGAN STANLEY CASES (FEW/GILREATH), TRANSCRIPTS, AND MISCELLANEOUS**

Few/Gilreath
Georgia Declaratory Judgment
(Formerly 6E)
White Notebook, James Brown v Morgan Stanley
Folder, JB Medical, 2006
AFTRA Benefits folder
Bills 2006
WM Financial Documents
Larry King Live Transcript
Gray Notebook, entitled Brown, J (From Levenson)
Transcript of Record October 23, 2008
Folder, JBE, Inc , Engagement Contract
Julia Jones Folder

✓ **BOX 89 - CANNON/DALLAS/MORGAN STANLEY CASES (FEW/GILREATH)**

Selected by counsel from other files
[Documents, including originals, from Dallas files (violet), Cannon and other Sources]

✓ **BOX 90 CLAIMS - INCLUDING PLEADINGS FOR CASES PENDING IN S C COURT²**

- 1 Class action claims
- 2 Corresp & Misc (Red Folder)
- 3 Pullman Group, LLC v RLB, Jr & AJP, PRs
- 4 Rodney A Peebles v RLB, Jr and AJP, as PRs & Trustees [See Amended Petition with bound pleadings notebook and correspondence re possible trial by stipulation
- 5 TIAA - claim not disallowed
- 6 Greenberg Traurig - Withdrawn
- 7 Jackson Law Offices vs RLB, Jr & AJP, PRs Case No 2008-CP-02-1549 Jury trial demanded Case Pending
- 8 Suggs Johnson LLC vs Estate - Pending
- 9 Lewis & Babcock vs RLB, Jr & AJP, as PRs and Trustees (Case # 122)

² Including claim forms from Cannon - most expired For immediate review

- Also see Box 110, Lewis & Babcock Claim Note Contains proposed Stipulation and series of letters in June re GT representation, Dallas, Cannon & Bradley's assertions with respect to GT
- 10 Intrigue Music Management, Inc vs RLB, Jr & Adele J Pope, PRs & Trustees Case No 2007-CP-02-1557 with Pleadings Notebook Note Interrogatories and 1st Requests for Production dtd 10/14/08 Stayed Now ready for answers See Answer Jury Trial Demanded
 - 11 Hull, Towill, Norman, Barrett & Salley vs RLB, Jr and AJP, as PRs Case No 2008-CP-02- See Answer Jury Trial Demanded
 - 12 Bobby Bennett a/k/a Famous Flames Claim Case No 2008-CP-02-1558 Claim dismissed after hearing Order dtd 10/23/08
 - 13 Charles A Bobbit vs RLB, Jr and AJP, as PRs, Case No 2008-CP-02-1556 Pending See Answer dtd October 9, 2008
 - 14 Phillip G Farr, CPA, P C vs Estate Case No 2008-CP-02-1553, with pleadings See Motion to Dismiss Dismissed on Motion of Estate See Form Order dtd 10/23/08
 - 15 Gene Staulcup & Associates vs AJP & RLB, Jr , as PRs Case No 2008-CP-02-1548 See pleadings, Motion to Dismiss Claim disallowed after hearing Order dtd 10/23/08
 - 16 William Murrell, Associates vs AJP & RLB, Jr , as PRs Case No 2008-CP-02-1555 See Pleadings Notebook Answer After Hearing, allowed in amount of \$8,170 and denied and disallowed \$1,100 See Order dtd 10/23/08 No Appeal Note Judgment, but not a priority claim
 - 17 Smith, Massey Brodie & Thurmond vs AJP & RLB, Jr as PRs Case No 2008-CP-02-1551 See Answer After hearing, claim in amount of \$33,322 20 allowed against Estate for services rendered in early 2007 See Order dtd October 23, 2008

✓ **BOX 91- (formerly 9A) - NEW YORK LITIGATION, TRANSCRIPT, FEBRUARY7, 2008, 2002 RECEIPTS NOTEBOOK**

Contains certain documents form the New York portion of the Pullman Litigation (See Pullman SC Claim and related Order for relationship between NY & S C Portion of Pullman "\$31 Million"Claim

Hogan & Hartson, Matthew Ballenger, Esquire, were engaged, and their engagement contract approved, pursuant to Court Orders dated June 22 and August 10, 2007 GT was terminated as counsel in the case, which was brought GT in the summer of 2006, prior to Mr Brown's death, for damages related to the failure to close of the Royal Bank of Scotland deal in May of 2006^{or} It relates to Pullman's claim [opposed by Estate/Trust/JBE, Inc] for a percentage of the aborted RBS deal under Paragraph 7 the February 24, 1999 contract between James Brown and JBE, Inc And the Pullman Group

which lead to the TIAA Royalty-Backed Note (June 11, 1999)

Pullman

On September 26, 2006 ~~the~~ counterclaimed for damages in excess of \$8 Million, and other relief

Caption SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK, JAMES BROWN, JAMES BROWN ENTERPRISES, INC ,
JAMES BROWN, LLC, PLAINTIFFS VS THE PULLMAN GROUP, DEFENDANT

Pleadings Notebook containing some of the pleadings, including

- | | | |
|-----|----------|---|
| 1 | 7/24/06 | Summons and Complaint |
| 2 | 9/26/06 | Answer and Counterclaim of the Pullman Group |
| 3 | 9/26/06 | Affidavit of David Pullman in Support of Motion to Dismiss |
| 4 | 9/26/06 | Notice of Motion to Disqualify Greenberg Traurig, Llp |
| 5 | 9/26/06 | Defendant's First Notice of Discovery and Inspection |
| 6 | 9/26/06 | Notice of Deposition of Plaintiffs |
| 7 | 9/27/06 | Defendant's Notice of Motion to Dismiss Second Cause of Action |
| 8 | 9/28/06 | Defendant's Memorandum in Support of Motion to Dismiss |
| 9 | 9/28/06 | Defendant's Memorandum in Support of Motion to Disqualify
Greenberg Traurig |
| 10 | 9/18/06 | Defendant's Request for Judicial Intervention |
| 10a | 10/12/07 | Memorandum in Opposition to Motion to Dismiss |
| 11 | Undated | Plaintiffs' Memorandum of Law in Opposition to Defendant's Motion
to Dismiss Plaintiffs' Claim for Tortious Interference |
| 11a | 10/26/07 | Reply Memorandum in Further Support of Motion to Dismiss |
| 12 | 10/27/07 | Plaintiffs' Memorandum of Law in Opposition to Defendant's Motion
to Disqualify Greenberg Traurig, LLP |
| 13 | 10/27/06 | Affirmation of Jeffrey B Sklaroff in Opposition to Defendant's
Motion to Disqualify Greenberg Traurig, LLP |
| 14 | 10/27/06 | Plaintiffs' Reply to Counterclaims |
| 15 | 10/27/06 | Notice of Videotaped Deposition of David Pullman |
| 16 | 10/27/06 | Plaintiffs' First Notice of Discovery and Inspection |
| 17 | 10/27/06 | Plaintiffs' Objections and Responses to Defendant's First Notice of
Discovery and Inspection |
| 18 | 11/1/06 | Reply Affidavit of David Pullman in Support of Motion to Disqualify |
| 19 | 11/2/06 | Defendant's Reply Memorandum in Support of Motion to Disqualify |
| 20 | 11/2/06 | Defendant's Reply Memorandum in Support of Motion to Dismiss |
| 21 | 8/14/07 | Affidavit of Albert H Dallas |
| 22 | 8/22/07 | Affidavit of Albert H Dallas |
| 23 | 8/27/07 | Notice to Take Deposition of Joseph Lizzio |

[If requested, we will be glad to discuss this matter at a weekly meeting]

White Notebook containin February 7, 2008 Hearing Transcript
 Black Notebook containing Hotel Receipts, etc from 2002

✓ **BOX 92 -FRIEDMAN FILE # 1**

Leon Friedman was Mr Brown's attorney for many years on various litigation matters Mr Friedman made himself available in New York in July of 2008, and at other times by telephone for background valuable information It was the July 17, 2007 telephone conference with Mr Friedman, with Messrs Dallas, Cannon, Bradley, and their Estate/Trust counsel present, which made clear that David Cannon had misappropriated the \$900,000 00 [Prior to the telephone conference, Mr Cannon asserted that he had deposited the funds at the direction of Mr Friedman Both Mr Friedman and the records reflect that this is not the case]

This is one of 6 boxes delivered to Buchanan and Pope for Estate after various requests As shown on shipping labels, first 2 boxes were shipped to Estate's official address in Aiken on October 28, 2008 They became part of the Reading Room on October 31, 2009 4 Additional boxes were shipped by Mr Friedman in 2009

Because of their historical importance in pending litigation, the Leon Friedman files in our possession have been carefully retained in their original order, although there is much which, for administrative purposes, could arguably have been transferred to the "Royalties" files, defense of the approximately \$16 Million of claims filed by Cannon, Dallas and Bradley, and other files

Contains the following files

JB - General, w/ ltr To Jg Al Bradley dtd March 18, 1999,

JB- Mashantucket Pequot Tribe v JB d/b/a/ the New JB, Inc (2000),

PolyGram Records, Inc w- James Brown, including ltr from PolyGram rep Janna Lasser to LF dtd May 3, 1999 enclosing 17 MGM & JB dtd 1/17/55,, King w JB dtd 6/23/60, Mercury Records Corporation w/ Fair Deal , Jadar, Polydor Incorporated w JB, Lin Broadcasting, JB and Top Notch, Inc , FINISH These contracts were part of the TIAA project which was closed on June 11, 2000 Brown, 2000,

Stallworth and Bennett v Polygram et al (N Y County Index 122196/98) This case was begin on December 10, 1998 by Mr Bennett related to PolyGram's and its predecessors' payment of royalties dating back to 1955 Matter was resolved more than a year later, but contains valuable background and contract information related to royalties to JB which were

Stallworth/Bennett Polygram - correspondence

Correspondence for earlier Stallworth/Bennett file Contains correspondence from 1999 and Leon Friedman's handwritten notes of history of JB, Bennett and the Flames, Summary of JB accounts from 6/30/91 and attorney/client and co-counsel information

Polygram - corporate

JB - Stallworth Claim - Polygram - contains Sept 8, 1998 pre-action disclosure of files, by POLYDOR INCORPORATED filed in County Clerk's office, excerpt from old Gene Schofield v JB, Polygram, Inc, Polydor Records, Inc Charles Bobbit, Dynatone, rights on Music, Inc f/k/a Belinda Music and others, 1997, Mass Dist Ct 95-10971-GAO, Order dtd June 11, 1997, re alleged infringement in use of song "King Heroin" June 12, 1997 Order granted SJ to Defendants See Order of Judge O'Toole dtd 6/12/97

JB- Prenup - Tam R - contains draft Agreement faxed from the Dallas Company on June 12, 2000 relates termination of JB and TR Hynie of business and personal relationships, severance package , including 1998 Mark VII Lincoln, \$21,000

JB - Regions Bank, Birmingham Ala & JBE, Inc Info

JB A&E - Corresp from 1995 re GOODMARC Productions, Inc , NY, JB and Roosevelt Johnson articles JB bio Deal terms, etc w/ the New JBE, Inc Corresp

JB Fridle, JB List, Model Songwriter Publicity K's, JB Other licenses, Derrick Monk, JB Corp Info, JB New Artemis, JB Seagrams, JB Seibel, JB Lipton Tea, JB Other matters, James Brown Eagle Rock, JB Desmond Gumbs, JB BMI Lawsuit, Biederman/Warner/Chappell, JB Mike Hartt Wedge DVD, JB Fridle/Simmons, JB Spencer, JB Movie Deal, JB Request for Permission, JB Other Problems, consider, JB- Mashantucket Pequot Tribe v JB d/b/a/ the New JB, Inc (2000), JB Reggie Simmons

[Also see boxes 93, 135, 136, 137, 138]

BOX 93 - FRIEDMAN FILE #2

See Comments to Box 92 Contains

JB - Arbitration

Universal Attractions, Inc Arbitration, dtd 1994

JB - Docs

James Brown v AC&R Advertising, et al vs PolyGram US District Court Case No 3 92-1195-0, Nelson Mullins attys for Polygram

JB - Mayo Arbitration

Scotti Brothers docs, Jerry Mayo v James Brown and Universal

Attractions Suit, Award of Arbitrator,
 JB - **Jeff Allen**
 Various correspondence 1989 - 2002
 Universal Attractions, Inc Arbitration 1994
 JB - **Other Universal Problems**
 Universal Attractions Correspondence 1989
 A F M Exclusive Agent-Musician Agreement, Feb 16, 1988 - Feb 15,
 1991
Red Rope
 JB - **Promotions**
 JB - **Claims**
 Jerry Mayo Enterprises, Inc vs James Brown Universal Attractions, Inc
 US District Court Case No 93-5434, Acknowledged receipt Oct 19, 1993
 JB - **Jay Ross - Video Pirates - Copyrights**
 Large Envelope to Friedman from Jan Sohayda, dtd Aug 26, 1995
 JB - **Jay Ross Video Pirates - Retainer**
 Copyright Registration and Renewal Forms - Dynatone Publishing - Ltr
 dtd June 10, 1995
 Correspondence dtd Oct 7, 1994 - Unlicensed Videos/CDs
 JB - **BROWN, JAMES**
 James Brown vs Ed Smith, Phil Citron a/k/a Philip Citron and Melody
 Fair Theater Petition dtd Oct , 1994

Red Rope
 JB - **Samples**
 Copyright Articles
 JB - **Merge**
 Handwritten Notes
 JB - **Pay-per-view**
 Agreement dtd Jan 8, 1991 between BET and Joe Brown and Adrienne
 Brown
 JB - **Other debts**
 Correspondence dated March 3 - 16, 1992 Re PolyGram James Brown
 Royalty Account
 JB - **gen'l corresp / notes**
 Faxsheets - dtd March 16, 1992
 Handwritten notes
 JB - **Correspondence -**
 dated May 20, 1996 - July, 1996 - re Seizure of property
 JB - **James Brown - Kenneth Cole**
 James Brown v Hearst Corporation et al, US District Court Case No
 3 91-2376-9
 James Brown v Kirshenbaum & Bond, US District Court Case No 3 91-

3619-19

Various correspondence regarding above cases

Red Rope

JB - **260**

Correspondence Dec 19, 1994 - April 16, 1996

JB - **Press**

June 22, 1996 Boston Herald article re Boston seizure case

JB - **Contract of Sale**

1996 Retainer Agreement

Re Boston seizure case

JB - **Letters from Customs Players List**

Notice of Seizure of Currency and/or Monetary Instruments

JB - **Warner, Polygram**

Various Agreements 1955 - 1979

Red Rope

JB - **Other**

Article, Case Research, Correspondence dtd March 15, 1994

JB - **Mayo - Corresp**

James Brown v AC&R Advertising, etc US District Court Case No 3 92-1195-0

Jerry Mayo v James Brown and Universal Attractions Suit, Correspondence 1993, 1994

JB - **Settlement**

James Brown v AC&R Advertising, etc US District Court Case No 3 92-1195-0, Correspondence dtd 1993

JB - **Retainer**

Contract for Legal Services

JB and Gergel, Friedman, Dallas and Simmons dtd 1992

JB - **Likeness**

Attorney Bills - 1992

Jerry Mayo v James Brown and Universal Attractions Suit, correspondence, Demand for Arbitration

Red Rope

JB - **Pull K's**

Various Agreements dtd 1955 - 1999

Correspondence re Trust for minor children of Reginald Simmons dtd 1998

JB - **Correspondence**

Correspondence and faxsheets re Foster Beer Complaint dtd 1991-1992

JB -

- Correspondence re Brown v Kenneth Cole, dtd 1992
- JB - Correspondence re Fred Wesley, dtd 1992
- JB - **Misc**
Correspondence re Samuel E Feldman, et al v James Brown —18-302-105, Judgment No 90 2079, dtd 1990 - 1992
- JB - **Bootlegs**
Correspondence dtd April 23, 1992 re James Brown Bootleg CDs
- JB - **Old Brown K**
1960 Agreement with King Records

Red Rope

- JB - **Lipton**
Lipton Ice Tea Deal - 2001
- JB - Distribution Agreement - Georgia-Lina Records, dtd April 7, 1998
Correspondence re Scotti Bros /All American dtd 1998
- JB - **UnderCover Brother**
"UnderCover Brother" dtd 2001

[Also see boxes 92, 135, 136, 137, 138]

BOX 94 – Royalties Historical (formerly 18A) and Royalties/ Fort Knox

M&T Statements 2008-2009

- TIAA - M&T REPORTS, Current (includes Trustee's Reports from 12/15/99 to 6/15/09)
- M&T Statements - BMI (includes statements from 3/2/08 - 3/31/09)
- M&T Statements - Warner Chappell (includes statements from 11/26/07 - 5/18/09)
- M&T Statements - Universal Music Group (includes statements from 10/15/07 - 4/7/09)
- M&T Statements - Fort Knox Music, Inc (includes statements 8/26/08 and 3/4/09)

ROYALTY STATEMENTS 2008-2009 AND OTHERS

- WEDGE (includes checks dtd 1/17/08 and 2/4/08)
- soundexchange (includes correspondence and statements from 2/4/08 - 3/16/09)
- Rhino Entertainment (includes statements dated 12/2007 and 12/2008)
- TABTOO BV Royalties (a Dutch company) (statement dated March 31, 2008)
- BMG Music (includes statements for Deanna & Yamma Music dated 10/01/07-12/31/07 and 10/1/08-12/31/08)
- Royalty-Backed Security Status Printout (includes statements and correspondence dated 4/2007 and earlier)
- James Brown LLC Royalties Collected and Bonds Outstanding (includes 2 statements dated 2007 and 2008)

Agendas and Related Docs (includes agendas from 1/23/07 - 3/3/08)

FORT KNOX

includes 2 groups of statements entitled 2006-1H and 2005-1H

ROYALTIES/ UNIVERSAL MUSIC GROUP

Including Statements to various entities dated 12/07, 6/08, 12/08, 6/07

CORBIS Corporation, Brown J Proposals

✓ **BOX 95 – BMI (formerly 17A)**

Includes 3 Red Rope folders containing quarterly royalty reports, including

2002 2nd - 4th Quarters

2003 1st - 4th Quarters

2004 1st - 4th Quarters

2005 1st - 4th Quarters

2006 2nd - 3rd Quarters

2008 1st Quarter, but no backup documentation

Also includes correspondence from 1993 and other royalty documents

[If requested, we will be glad to discuss this matter at a weekly meeting]

✓ **BOX 96 – Royalties - Warner/Chappell**

WARNER/CHAPPELL ROYALTIES

Materials related to W/C royalties, Including

Statements dated

9/30/02 - 6/30/04 AUDIT

2006 - 3rd and 4th Qtrs

2007 - 2nd, 3rd and 4th Qtrs

2008 - 1st and 2nd Qtrs

2008 - 3rd and 4th Qtrs

Jadar, Etc For Jan - March 2009

Haber Corporation royalty Examination of Warner Chappell Music, Inc On Behalf of James Brown LLC for the Periods Ended September 30, 2002 to June 30, 2004

✓ **BOX 97 - TIAA (formerly 20A)**

This box contains a copy of the closing package and Agreements of Mr Brown, JBE, Inc , James Brown, LLC, opinions of counsel, Indenture, etc for the June 11, 2000 \$26 Million Royalty-backed Note held by the New York Teachers' Union (TIAA), with Manufacturers' and Traders'

✓ **BOX 98- MISCELLANEOUS FILES FROM CANNON**

AFTRA 2005 and Earlier, Dallas, Suntrust, medical 2005 and earlier, RegionsBank, Smith Barney, Citigroup 2005 and earlier, CitiGroup mailings, etc, JB, Deanna, Yamma, Draft of Inventory and Appraisalment, Cannon "important papers", SC Employment Security, 2006, 2006 940s, January 2006, February 2006, March 2006, April 2006, May 2006, Trio Music, June 2006, July 2006, August 2006, September 2006, October 2006, November 2006, NOTE Monthly folders containing various statements, receipts, etc

✓ **BOX 99- Box Marked Important Mr Brown**

Containing Unsorted manila folders, checks and other documents pertaining to Alfie Enterprises, James Brown West, Inc, Mrs James Brown Household Account, Mostly appear to be early nineties, but also contains WAAW Radio Station Account Reconciliations from 2003, info re Regions Bank acct 1/n/o WAAW Radio "The Boss", DGC P O box 691 Barnwell 29812-0691

✓ **BOX 100 - L&B** **L&B Master file ONE**

3 Expandos -

Note Most docs removed by counsel to other files Videotape Estate & Security

CD - Video of Brown House 12-26-06

CD - 744

✓ **BOX 101 - L&B** **L&B Master File TWO**

Marc Jacobson

Red Rope 1853-1977

Red Rope 2252 -2274

Red Rope 18498 - 18971

Red Rope 18310 - 18497

Red Rope 18974 - 20167

Red Rope 20168 - 20239

✓ **BOX 102 - L&B** **L&B Master File THREE**

Red Rope 20648 - 20732

Red Rope 20733 - 20735

JBE, Inc Returns

Red Rope 20261-20566

James Brown Tax Return 1999 - 2005

NM ltr and docs, Geronimo, LLC

✓ **BOX 103 -** Morgan Stanley - Seventh Decade Statements

✓ **BOX 104 -** Box shipped from David Cannon to Lewis Levenson [sic] UPS next day air

12/5/07

See unconfirmed inventory inside

✓ **BOX 105 -** Box shipped from David G Cannon to Lewis Levenson [sic] December 5, 2007
[See Box 104]

✓ **BOX 106 -** Box shipped from David Cannon to Lewis Levenson [sic] December 5, 2007
[See Box 104]

✓ **BOX 107 -** Personal accts /reacct and various Documents from David G Cannon
Long Banker's Box
Behind Blue Tabs

A - David G & Margaret A Cannon Individual Tax Returns 2000 - 2006

B - Regions Acct #39-3003-2170 (David & Margaret)

C - Regions Acct #39-300 (David & Margaret)

D - Enterprise Bank Acct # 211003348 971 Marlboro Avenue

E - J & D, South Carolina, LLC, Partnership Tax Returns

F - M & D, LLC, Corp Tax Returns

I - VoicePort, LLC

✓ **BOX 108 -** Long Bankers box
1 of several delivered by L & B to 1218 Taylor Street in August, 2007
[Control retained by Dallas/Bradley and L&B until Nov 20, 2007]
various 2006 and 2007 JB & JBE, Inc files, Note Miscellaneous file contains
inventory of cars i/n/o name of JB, JBE, Inc

✓ **BOX 109 -** Long Bankers Box from David Cannon containing numerous small DGC & other
files for period 2001 - 2007 including BellSouth, AmEx, taxes 2004 and others

✓ **BOX 110 - Lewis & Babcock Suit (L&B)**

Also See Claims file, **Box 90** Additional information, correspondence, re claim,
w/ Pleadings Notebook Containing 2008-CP-02-1551, Lewis & Babcock, LLC, Plaintiffs
vs Robert L Buchanan, Jr and Adele J Pope, PRs of the Estate of James Brown, Defendants

1 08/21/08 Summons & Petition for Allowance of Claim,

2 09/18/08 Answer to Petition and to Petition for Allowance of Claim

3 10/07/08 Amended Petition

4 10/15/08 Answer to Amended Petition

[For further discussion at weekly meeting, if requested]

✓ **BOX 111 - (formerly Box 1B) - Brown Administrative Historical**

Contains various original documents and tapes, CDs, etc including

Black Notebook (Small) entitled "Minutes James Brown Estate"
Containing various documents, including 2007

- 1 Transactions Listing - Balance and Open Invoices as of 6/8/07 & handwritten notes re Terry Cox of Cola wants to buy the whole deal 7 or 8 of July 10 30 office in Augusta Ga Suntrust Hull & Hull
- 2 Statements from 2007
- 3 Affidavit of Alfred A Bradley dtd February 6, 2007 re Shawn Thomas blocking exit on January 23, 2007,
- 4 Minutes, James Brown Estate, Feb 22, 2007
- 5 Minutes, James Brown Estate, Feb 27, 2007
- 6 Various authorizations, Expense statements
- 7 James Brown Estate - Accounts Payable 2/22/07
- 8 Minutes, James Brown Estate, Jan 3, 2007
- 9 Minutes, James Brown Estate, Jan 5, 2007
- 10 Minutes, James Brown Estate, Jan 23, 2007
- 11 Minutes, James Brown Estate, Jan 24, 2007

Passbook Savings account book,
CONFIDENTIAL Original 1991 Pay Per View Agreement Between Butch Lewis Productions, Inc , BET contract and related correspondence for period

CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #1
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #2
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #3
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #4
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #5
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #6
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #7
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #8
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #9
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #10
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #11
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #12
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #13
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #14
CD, MR JAMES BROWN DIGITAL COPY OF ARCHIVAL DATA #15
CD LEWIS & BABCOCK 7-116, PDF JULY 19, 2007, JOB 070140
CD TOMI RAE I STILL CARE
CD PULLMAN
CD TRANSCRIPT OF 12/21/07 HEARING
CD AFRICAN AMERICAN HISTORY COLLECTION
CD SWORN STATEMENT OF MARY HOLMES FEBRUARY 1, 2007

CD VIDEO OF TOMI RAE HYNIE BROWN - FEBRUARY 9, 2007
CD LAMINATED POSTER
CD JAMES BROWN SAFE INVENTORY, FEBRUARY 26, 2007 1 OF 2
CD JAMES BROWN SAFE INVENTORY, FEBRUARY 26, 2007 2 OF 2
CD SWORN STATEMENT OF DIANE STERLING, FEBRUARY 3, 2007
CD JAMES BROWN AND BITTERSWEET
Keys, Beech Island

OCTOBER 19, 2006 PHOTOS JAMES BROWN MAUSOLEUM SITE EXTERIOR OF
RESIDENCE ATTORNEY ALBERT H DALLAS
LAURICE MONICA AND BITTERSWEET
BROWN HOME BY TOM WELLS
CD Sworn Statement of Diane Sterling, February 3, 2007
2 CDs Sworn Statement of David Bernard Washington, January 29, 2007
2 CDs Sworn Statement of Joseph Lee Sr, January 31, 2007
CD Sworn Statement, Jewel Libby, February 5, 2007
2 CDs, Sworn Statement, Larry Fridie, February 2, 2007
CDJAMES BROWN ESTATE PLANNING FEBRUARY 24, 1999
CD JAMES BROWN ESTATE - S C UNIVERSITY IP STANBACK MUSEUM
CD SWORN STATEMENT - JEWEL LIBBY FEBRUARY 5, 2007
CD JAMES BROWN SOUL SESSION CINE VU
AUGUSTA MUSEUM OF HISTORY - LOAN
CD WITH NOTATION WJBF 2/5/07 11 PM, CHANGE IN SECURITY GUARD
JAMES BROWN WEDDING DECEMBER 14, 2001 JIMMY
CARTER/PHOTOGRAPHER
CD JAMES BROWN TURKEY GIVE AWAY
CD computer documents from Phil Farr, 1/24/08

PLASTIC ENVELOPE CONTAINING 33 CDS OF PHOTOS, ETC , INCLUDING
1 JAMES BROWN - SCHOOL IS IN
2 LAST XMAS PARTY - STATUE 2 PICS
3 XMAS TOYS 2004
4 VARIOUS, INCLUDING WEDDING
5 JAMES BROWN DAY 2003 - AIKEN VIDEO
6 JAMES BROWN DAY 2003
7 JB CYCLES, JB HOT, JB SHOW, PAINE COLLEGE, HONORS, JB
8 GODFATHER HOMECOMING 1ST SET
9 GODFATHER HOMECOMING 1ST SET
10 GODFATHER HOMECOMING 2D SET
11 GODFATHER PICS MISC
12 JAMES BROWN TURKEY GIVE AWAY 2004
13 JB STATUE UNVEILING
14 JAMES BROWN X-MAY TOYS 2002

- 15 JAMES BROWN X-MAS PARTY 2002
- 16 JAMES BROWN GIVE AWAY 2002
- 17 JAMES BROWN X-MAS 2004
- 18 JAMES BROWN TURKEY GIVE AWAY 2005
- 19 JAMES BROWN BIKE RACE GEORGIA
- 20 JAMES BROWN WEDDING
- 21 JAMES BROWN XMAS 2003
- 22 JAMES BROWN WEDDING 12-14-2001 PHOTOS BY JIMMY CARTER
- 23 JAMES BROWN TURKEY/TOY/XMAS PARTY 2002
- 24 JB PARTY TURKEYS AND TOY 2002
- 25 RUSSELL BROWN & 2 USCA 2003-2004, LSCA SOCCER
- 26 PAINE CT WALKER - PAINE CHALLENGE- PAINE VIGIL- GENT STORE -
JB TURKEY KIMS BIG DAY-GATHERING
- 27 JAMES BROWN TURKEY/X-MAS/COMCAST/WEDDING
- 28 ANIC #1
- 29 JB X-MAS
- 30 BRE SID MILLER AYC/AYC TIM/ CUTRO & XMAS/ART GROW SHOW
- 31 MOJO INTERVIEW 2004
- 32 JAMES BROWN FESTIVAL 2006
- 33 GODFATHER PRINTED, JB BROCHURE, JB FESTIVAL 2006
- JAMES BROWN VIDEO 2003

Blank checks for Estate

Picture of Beech Island fence damage from storm of April 2009

[If you would like, we will be glad to discuss how we acquired these CDs for the
Estate/Trust at a weekly meeting]

✓ **BOX 112 - TOM WELLS CLAIM, INVENTORY OF JAMES BROWN'S HOME,
JAMES BROWN ENTERPRISES LIBBY ACCT GEORGIA BANK 7 TRUST 1016856,
AND CERTAIN DALLAS FILES, GEORGIA FARM BUREAU (DALLAS) CASE**

This Box contain various Historical Records from Dallas and L&B, and the Wells Case
Claim, including

- 1 Red Rope 2000 Libby Account folder with copies of Cannon Reconciliations,
checkbook stubs and checks [Formerly Box 2 of L&B Box 18]
- 2 Red Rope Inventory of James Brown's House from Wells Notebook (or earlier drafts)
- 3 Red Rope Folder - Subpoenas - all cases
- 4 Pleadings Notebook

JUN 29 2009

Tom Wells File containing pleading from his suit
Tom Wells, Plaintiff vs Robert L Buchanan, Jr and Adele J Pope, PRs of the Estate of
James Brown, Defendants, 2008-CP-02-1552
with the following

1	9/10/08	Summons & Complaint
2	9/10/08	Petition for Allowance of Claim
3	9/10/08	Notice of Motion and Motion to Remove Action to Circuit Court
4	10/08/08	Answer to Complaint (Not Signed - Waiting on Signed Copy from Buchanan's Office)
5	10/08/08	Motion to Dismiss (Not Signed - Waiting on Signed Copy from Buchanan's Office)
6	10/13/08	Plaintiff's First Set of Interrogatories to the Defendants
7	10/13/08	Plaintiff's First Set of Requests for Production of Documents to the Defendants
8	10/13/08	Plaintiff's First Set of Requests for Admission
9	10/13/08	Notice of Taking Deposition of Robert L Buchanan, Jr , and Adele J Pope
10	3/9/09	Notice of Taking Depositions of Robert L Buchanan, Jr and Adele J Pope w/COS

GEORGIA FARM BUREAU MUTUAL INSURANCE COMPANY vs ALBERT H DALLAS, ADELE J POPE AND ROBERT L BUCHANAN, JR , AS PERSONAL REPRESENTATIVES OF THE ESTATE OF JAMES BROWN, DECEASED, AND AS TRUSTEES OF THE JAMES BORWN 2000 IRREVOCABLE TRUST AND JAMES BROWN ENTERPRISE, INC , Superior Court of Glascock County, Georgia Civil Action No 08-0610

[If requested, we will be glad to discuss this matter with you at a weekly meeting]

✓ **BOX 113 -DAVID CANNON DOCUMENTS**

Numerous additional documents and subfiles appearing to all be related to Voice Port, LLC

✓ **BOX 114 - FORLANDO BROWN VS ADELE J POPE, INDIVIDUALLY AND AS TRUSTEE OF THE IRREVOCABLE TRUST ESTABLISHED BY JAMES BROWN IN AUGUST 1, 2000 AND ROBERT L BUCHANAN (Same), S C Federal Dist Ct , Columbia, Division, Case No 3 08-CV-00014-WOB**

This box contains

2 Large Black Notebooks, Plaintiffs' Hearing Exhibits, for Preliminary Injunction Hearing (1 -40) and (41 - 65)

Miscellaneous Pleadings and Correspondence

Copies of Depositions of Robert L. Buchanan, Jr ,

3 Pleadings Notebooks containing the following

1	12/31/07	Complaint
2	1/02/08	Plaintiff Forlando J. Brown's Responses to Local Rule 26.01 Interrogatories
3	1/03/08	Summons in a Civil Action
4	1/07/08	Amendment to Complaint
5	2/04/08	Notice of Appearance
6	2/04/08	Responses to Local Civil Rule 26.01 Interrogatories of Defendant Robert L. Buchanan, Jr., Individually and as Trustee of the Irrevocable Trust Established by James Brown in August 1, 2000
7	2/04/08	Answers of Defendant Adele J. Pope, Individually and as Trustee of the Irrevocable Trust Established by James Brown in August 1, 2000 Rule 26.01 Interrogatories
8	2/04/08	Defendants' Motion to Dismiss Plaintiff's Complaint and Amended Complaint
9	2/04/08	Defendants' Memorandum in Support of Motion to Dismiss Plaintiff's Complaint and Amended Complaint
10	2/22/08	Plaintiff Forlando Brown's Response to Motion to Dismiss
11	2/22/08	Affidavit of David Bell, Esq
12	3/03/08	Notice of Taking Video Deposition of Robert L. Buchanan, Jr
13	3/03/08	Plaintiff Forlando Brown's First Requests for Production of Documents to Defendants Adele Pope and Robert Buchanan
14	3/03/08	Defendants' Reply Memorandum in Support of Motion to Dismiss Plaintiff's Complaint and Amended Complaint
15	3/03/08	Plaintiff Forlando Brown's First Interrogatories to Defendants Adele Pope and Robert Buchanan
16	3/24/08	Plaintiff Forlando Brown's Motion for Preliminary and Permanent Injunction Plaintiff
17	3/24/08	Plaintiff Forlando Brown's Brief in Support of Motion for Preliminary and Permanent Injunction
18	4/10/08	Defendant's Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction and Permanent Injunction
19	4/11/08	Affidavit of Adele J. Pope
20	4/16/08	Memorandum in Support of Motion of Defendant Adele J. Pope to Disqualify Plaintiff's Law Firm Powell Goldstein, L.L.P.
21	4/18/08	Plaintiff Forlando Brown's Reply to Motion for Preliminary Injunction and Permanent Injunction
22	4/29/08	Second Amendment to Complaint

JUN 23 2009

23	5/01/08	Affidavit of Frank S McGaughey, III
24	5/01/08	Plaintiff Forlando Brown's Response to the Defendants' Motion to Disqualify Plaintiff's Law Firm Powell Goldstein, LLP
25	5/05/08	Motion in Support of Pro Hac Vice Admission
26	5/08/08	Reply Memorandum of Defendant Adele J Pope to Plaintiff's Memorandum in Opposition to Motion to Disqualify Plaintiff's Law Firm Powell Goldstein, L L P
27	5/14/08	Defendant Robert L Buchanan, Jr , Individually and as Trustee of the Irrevocable Trust Established by James Brown in August 1, 2000 Responses to Plaintiff's First Request for Production of Documents
27a	5/23/08	Defendant's Memorandum in Opposition to Motion for Pro Hac Vice Admission of David Bell
28	05/27/08	Defendants' Memorandum in Response to Motion to Amend Complaint
29	6/5/08	Brief of Forlando I Brown in Support of Motion of David Bell to Appearance Pro Hac Vice Exhibit A Affidavit of David Bell Exhibit B Affidavit of William V Custer
30	6/11/08	Answers to Plaintiff's First Set of Interrogatories by Defendant Robert L Buchanan, Jr Individually and as Trustee of the Irrevocable Trust Established by James Brown in August 1, 2000
31	07/02/08	Plaintiff's Responses to Defendant R L Buchanan's First Set of Interrogatories
32	7/2/08	Plaintiff's Response to Defendant Robert L Buchanan, Jr 's First Request for Production to Plaintiff
33	7/30/08	Amended and Supplemental Answers to Plaintiff's First Set of Interrogatories of Defendant Adele J Pope, Individually and as Trustee of the Irrevocable Trust Established by James Brown in August 1, 2000 w/COS
34	8/6/08	Confidentiality Order
35	8/8/08	Defendants' Motion to Dismiss Plaintiff's Complaint and Second Amended Complaint
36	9/4/08	Plaintiff Forlando Brown's Answer to Defendants' Counterclaim w/COS
37	9/5/08	Subpoena in a Civil Case
38	9/11/08	Notice of Deposition of Forlando J Brown w/COS

Miscellaneous Loose pleadings and correspondence

✓ **BOX 115 – Box delivered to 1218 Taylor Street in August, 2007 under August 10, 2007 Court Order**

Contains blank JBE, Inc , checks Blank deposit slips and stamp, Regions Bank Checkbook, Regions Bank, "I Feel Good" Trust of James Brown, last entry, 8/8/07 Checkbook,

Regions Bank I/N/O The Irrevocable Trust of James Brown, last entry 4/18/07 Checkbook, Regions Bank, The New James Brown Enterprises, Inc , with notation "acct closed January of 2007" with receipts inside Checkbook, Estate of James Brown, first entry February 23, 2007, last entry, 4/30/07 Note check register of Dallas and Bradley covering period 8/28/07 – 11/17/07 was added to this box

✓ **BOX 116 – Box delivered to 1218 Taylor Street from Lewis and Babcock in August, 2007 pursuant to 8/10/07 Order in Case 122**

Grammy Awards Invitation

Note front of file contains unofficial stack of documents copied by Audra Byrd, counsel for Messrs Dallas and Bradley, on 2/4/2008, including

1 Docs bearing various L&B numbers under 2100, including info re SouthTrust judgment, TRHB prenup, and 1991 document JBE Inc and DGC filing foreign SouthTrust Judgment, Assignment of SouthTrust Judgment to Cannon, Satisfaction of Judgment, JB collection/receipts 12/29/06 - 2007, Statements of Libby, Sterling, Holmes, Rembert, D Washington, Agreement TR Hynie and JBE dated June 19, 2000, signed and witnessed by Charles Bobbit, Johnny R Phill IPS and Albert H Dallas, Statement of Colonel Joseph Lee and other documents

Contains numerous automobile folders including title insurance, 1988 Ford Pickup, 1962 Ford Thunderbird, 1983 Ford Van, Lincoln NAV, 1972 Rolls Royce, 1941 Lincoln, 2005 Chrysler 300, 1992 Mercedes, 1992 Mercedes 190E, 1990 Lincoln, Rhodes Imports 1988 Merc 300E, 2004 bank records, Skymiles, Ford Motor Credit, German Shepherd, male, Bank of America, Associates National Bank, Delaware (from 2000), SAG Information, brown folder entitled "Deanna", limousine, 1991 Mercedes, 1941 Lincoln Towncar, 1985 Lincoln, 1991 Ford, Chevy Roadster, 67, bus (located at Lewis Bus Lines in Augusta) Folder containing MGM correspondence to JBE, Inc, 2004 Social Security Folder AFTRA Health and Retirement Funds envelope Medical Insurance statements FedEx information from AFTRA (2006) Re coverage and billing for 2006 Citibank Credit Card Bank records, August 2003 Bank records, Regions Bank, the New JBE, Inc , 2003, 2004 and 2005 Autos House insurance Leon Friedman Regions Bank Royalties Statements from 2004 Sizemore, Inc Taxes State Farm Policy JBE Fax Coversheets from 2002 and 2003 Insurance claims pending IAPA Jackson Heat, A/C Requests for Change in Case Status WAAW James Huff Advance Disposal Policy file WAAW Radio Medicare 1999 Ford Expedition

✓ **BOX 117 - MISCELLANEOUS DOCUMENTS DELIVERED TO 1218 TAYLOR STREET IN AUGUST, 2007**

Containing

- 1 Numerous Small Manila Folders
- 2 Notebooks

- 3 Composition book
- 4 Several envelopes containing various documents

Files include

- 1 Medical bills
- 2 Keeps
- 3 Application for Social Security Card
- 4 Alltel 9-25-03
- 5 Netco
- 6 SAG
- 7 AFTRA
- 8 Regions Case
- 9 B&B Ford
- 10 Bobby and Vicky Byrd-Friedman, attorney contains complaint dtd 10/31/02 with exhibit A listing sound recordings in dispute
- 11 Peace in the World
- 12 Legal 2002
- 13 Roosevelt Johnson
- 14 Regions Bank Savings, with account passbook showing \$2,100 as of 9/20/02
- 15 Band
- 16 Blank folder containing offer related to radio station WKIM from JBE, Inc , August 15, 2005
- 17 WKIM billing
- 18 Waste Management
- 19 Christmas Party 2002
- 20 AF of M
- 21 CINTAS
- 22 DGC and Associates containing letters from 2005
- 23 Days Inn
- 24 Complaint
- 25 Paid Bills 2004
- 26 Barclay's
- 27 Bank of America
- 28 Bank of America 0800
- 29 Bank of Amercia 3007
- 30 Tomi Rae Medical bills
- 31 Waste Managment
- 32 July 1997
- 33 JB Project, JA Seaton, June 1997 (related to addition to residence)
- 34 JB Project, John Seaton, May 1997 (related to addition to residence)
- 35 JB Project, John Seaton, April 1997 (related to addition to residence)
- 36 JB Project, John Seaton, March 1997 (related to addition to residence)

✓ **BOX 118 - MASTER FILE (DOCS PRODUCED BY LEVENSON)
/LIBBY/JANUARY/2000/DGC(VARIOUS FILES)**

Litigation folder from period between resignation of David Cannon on August 10, 2007 and Resignation of Dallas & Bradley on November 20

NOTE Documents retained in this manner for litigation control purposes Various subject matters

Files includes

1 Red Rope -Documents produced by Louis Levenson on 10/31/07 pursuant to subpoena

Various original documents, including band payroll records, airline tickets, etc , mostly from 1999 and 2000 Also includes Hotel Albergo receipts for Mr And Mrs Jack Bart, Arrival 1/1/00 Departure 3 1 00, with entries for M/M Brown, Mrs Harvin, Mr Johnson, M/M Bart JBE, Inc Receipt forms , papers from James Brown construction projects 1999, Invoices from Kalitta Flying Services, Inc Ypsilanti, Mi, Bradley Services, Inc Suntrust Bank overdraft reminder, Hotel accommodations for Jg Alford [sic] Bradley, R Johnson , T R Hynie, Candace Hurst Original AT&T telephone bills, airline tickets, Ontario, Canada, Las Vegas for Damon Wood, limousine and shuttle receipts, others, engagement contracts, etc

2 Red Rope - Master File 9/11/07 - Docs Produced to Levenson -

These are documents, all bearing L&B numbers, which were appear to have been produced by then-PR/Trustees (on 9/11/07) Dallas and Bradley (Cannon had resigned) Includes the following

a SONY BMG Royalty Summary Statement for JB and JBE for period ending June 30, 2006, with Earnings Detail (Approx 180 pages)

b Garnishment Way to Go Transportation

- 3 Phil Farr 9-15-000 Tax Returns of JBE, Inc For 1999 and 2000
- 4 SoundExchange Statement, the New JBE, Inc For period ending December 2006, Earnings (approx 60 pages)
- 5 Statement, Classification of claims (code)
- 6 Ltr Dtd 9/16/03 Richard Taylor and check
- 7 Geronimo Music LLC Statement, w/ Kobalt New Royalty List (ab 25 pages)
- 8 Seventh Decade Productions Income Statements for 12/31/05 and Jan1, 2006 - July 31, 2007
- 9 JB Memo for Trust file - w/ Ltr from F McGaughey, Powell Goldstein re The James Brown "I Feel Good" Trust dtd July 12, 2007 w/ unsigned Declaration of Trustees to change situs to Georgia
- 10 Docs Re Deanna & Yamma Publishing , including check, overseas info
- 11 Info re Pure Heart - Unity BMI 6/30/88 foreign Royalty Statement
- 12 Copies of various Royalty checks and records

- 3 **Red Rope File -LIBBY/JANUARY/2000**
(Household Bills and expenses, Travel Expense/Payroll - Portugal)
 Numerous original documents, as well as copies of checks from 2000, Original
 BellSouth, AT&T & Cellular One phone bills from 1999
 Empty envelope marked Libby January 2000
 Manila Envelope of Receipts , etc
- 4 **Approximately 29 Small Manila folders (various DGC) dated 2006 & 2007**
- 5 **Fax From David Yount to Adele J Pope dtd November 13, 2007 (47 pages)**
 This is one of several pieces of information Buchanan and Pope received at happened
 just before the November 15, 2007 hearing, continued until November 20, 2007 The
 combination of all of the information which arrived the week before the hearing and
 the Cannon testimony of November 15, 2007, made the Dallas/Bradley resignations
 inevitable

✓ **BOX 119 - GERONIMO/ INTRIGUE**

This box includes various Geronimo Music, LLC documents

- 1 July 10, 2007 - Initial corresp of Buchanan & Pope with Bill Latham (NM), counsel for
 Copsidas, Intrigue, Bobbit (and Intrigue employee), and Ransom Notes Attempting
 to obtain information about value , etc as Sas pursuant to Court Access Order
 recently issued
 [This was just before the July 17 discovery which lead to Cannon's resignation]
- 2 November 21, 2007 - Buchanan & Pope corresp w/ Intrigue's counsel re
 contract
- 3 Corresp Re contract
- 4 Corresp Re proposed March 11, 2008 meeting, to include
 - a Review of Credentials
 - James Brown 2000 Irrevocable Trust
 - Ransom Notes
 - Albert H Dallas
 - David G Cannon
 - Charles Bobbitt
 - b Election of Managing Member
 - c Designation of Tax Matters Partner
 - d Notation for Record of Immediate and Permanent Resignation of David G Cannon
 as officer, director or fiduciary of Geronimo and other Brown Entities as of

August 10, 2007

- e Investigation of Protest of Estate of James Brown, 9/30/07payment/report
- f Review of 2006 Tax Returns, Circumstances of Filing
- g Review of 2007 Financial Reports
- h Proposed designation of Williams Sellars CPA to prepare entity return
- i Review, Contract of company with James Brown, including location of masters, etc
- j Review of contract w/ IMMI
- k Address for business

5 Notice Of August 5, 2008 Meeting, with purpose to include

- a Approval of minutes of March 11, 2008 meeting (proposed minutes attached)
- b Investigation of protest of Estate of JB re failure to pay artist's fees
- c Failure of Intrigue to deliver financial records as directed in March, 2008
- d Investigate Cannon's prep and/or filing of 2007 tax returns in violation of Aug 10, 2007 Order

Includes termination Notice delivered on March 11, 2008

Also includes corresp Re Termination of contract with Intrigue Ownership issues, etc

Subfiles include

BMI/Royalties, taxes, correspondence, Delaware Corp/minutes, contracts/operating agreement, balance sheets, docs copied by counsel

[If requested, we will be glad to discuss this matter at a weekly meeting]

✓ **BOX 120 - CANNON MATTERS**
(Formerly 6F)

Miscellaneous matters related to David Cannon including the following subfiles

- 1 Correspondence prior to death
- 2 Tax returns (contains individual tax returns of DG & MA Cannon for 2004, 2005 and 2006 and JB for 2006)
- 3 John Smith
- 4 3687 Wheeler Road
- 5 David Washington
- 6 Original documents returned by Court of Appeals
- 7 Correspondence

Contains approximately 75 page document related to Movie contract with fax dtd April 3, 2007 Contains approximately 75 page Supplemental Responses of DGC dtd Nov 13, 2007 to Interrogatories, Case 122

Also contains
Correspondence related to Buchanan/Pope arrangements to go to Barnwell on July 17,
2007

Folder of Intrigue payments to DGC, JBE analysis, Regions Bank statements, DGC
balance sheets and other correspondence and documents, bills, expense reports for 2007, etc

BOX 121 - CANNON MATTERS
(Formerly 6B)

Red Rope folder entitled G Harris containing approximately 1150 documents delivered by Greg Harris, prior counsel for Mr Cannon bearing numbers 0001 - 1151 These documents contain most of the pleadings related to attempts to obtain information and other relief from Cannon, Dallas and Bradley prior to August 10, 2007 also contain correspondence of Cannon prior to death until end of 2007 and other information including emails from Mr Cannon from as early as 2005 through 2007

Manilla folder entitled G Harris docs contains additional and some duplicate documents with random numbers produced by Greg Harris

Contains copies of pleadings in subfile entitled Cannon Appeal including

- 1 Initial brief of respondents (Dallas Appeal)
- 2 Notice of Appeal dated Jan 17, 2008
- 2 Initial Brief of Respondents
- 3 Excerpts from transcripts, Nov 15-20, 2007
- 4 Joint Affidavit of Buchanan and Pope dated October 8, 2008
- 5 Joint Affidavit of Buchanan and Pope
- 6 Respondents Return to Motion for Extension
- 7 Return to Petition for Supersedeas dtd Jan 30, 2008
- 8 Order dated Jan 6, 2008r
- 9 Order dated Feb 1, 2008
- 10 Motion to be Relieved as Counsel
- 11 M&T's Return to Motion to be Relieved as Counsel
- 12 Return to Petition for Supersedeas
- 13 Order dated Feb 12, 2008
- 14 Order dtd Feb 6, 2008
- 15 Emergency Petition for Further Clarification
- 16 Correspondence dtd 1/23/2008 to Court
- 17 Other correspondence to Court from David Cannon and correspondence from Counsel
- 18 Order dtd Dec 18, 2007 (Early)
- 19 Order dtd Jan 16, 2008 (Early)
- 20 Motion to Reconsider dtd 12/26/07

21 Order Granting Motion for Relief of counsel dtd 3/18/08

Contains Memorandum of Buchanan and Pope to Dallas/Cannon/Bradley July 20, 2007
re \$900,000 check approximately 25 pages

Folder entitled Relevant Documents containing Miscellaneous matters related to Cannon
including Affidavit of David Cannon dtd August 2, 2007

David Cannon financial statement filed under seal VP Capital Recovery Documents

✓ **BOX 122 - CANNON/DALLAS/BRADLEY CLAIMS - SOUTHTRUST LITIGATION
FILE (Note this file Royalty Statements Pullman docs)**

- 1 CD - James Brown Writers Share Catalog
 - A Agreements, Royalty Statements, Pullman Documents
- This is the CD version of Pullman Royalty information

South Trust Litigation folder contains numerous documents including

1 Deposition of David Cannon dated July 18, 2002, SouthTrust Bank, a United States bank vs Alfred Bradley, David Cannon and Albert H Dallas as Trustees under the Irrevocable Trust Agreement of James Brown as Grantor, dated August 1, 2000, first defendant, and James Brown Enterprises, Inc , second defendant, Richmond County GA Civil Action # 2001-RCCV-728, p 1-59

2 Condensed Deposition of Alfred Bradley dated January 15, 2002, SouthTrust Bank, a United States bank vs Alfred Bradley, David Cannon and Albert H Dallas as Trustees under the Irrevocable Trust Agreement of James Brown as Grantor, dated August 1, 2000, first defendant, and James Brown Enterprises, Inc , second defendant, Richmond County GA Civil Action # 2001-RCCV-728, p 1-13

3 Deposition of David G Cannon

- 1 Alfred A Bradley vs Robert L Buchanan and Adele J Pope as Personal Representatives
Case No 2008-CP-02-1427

A Pleadings Notebook containing

- 1 3/05/08 Summons and Petition for Allowance of Claim w/COS
- 2 3/06/08 Order of the Honorable Sue H Roe for Removal
- 3 3/24/08 Answer to Petition for Allowance of Claim w/COS
- 4 4/22/08 Affidavit of Alfred A Bradley
- 5 4/22/08 First Set of Interrogatories to Be Answered by Respondents Propounded

- on Behalf of Petitioner Alford A Bradley
- 6 4/22/08 First Request for Production of Documents to the Respondents
Propounded on Behalf of Petitioner Alford A Bradley w/COS for 5 & 6

See Order of Doyet A Early III, dated August 18, 2008, Consolidating Claims of Cannon, Dallas and Bradley for purposes of Discovery

B Miscellaneous Docs related to Claim

- 2 David G Cannon v Robert L Buchanan and Adele J Pope as Personal Representatives
Case No 2008-CP-02-1425

A Pleadings Notebook containing

- 1 3/04/08 Summons and Petition for Allowance of Claim w/attachments
- 2 3/04/08 Order of the Honorable Sue H Roe for Removal
- 3 3/24/08 Answer to Petition for Allowance of Claim w/COS
- 4 Undated and Unsigned Respondents' Motion for Summary Judgment
- 5 Undated and Unsigned Affidavit of Robert L Buchanan, Jr in Support of
Respondents' Motion for Summary Judgment
- 6 4/4/08 Affidavit of Robert L Buchanan, Jr in Support of Respondent's Motion
for Summary Judgment
- 7 4/21/08 Motion to Strike the Affidavit of Robert Buchanan, Jr Made in Support
of Respondents' Motion for Summary Judgment, the Attached Exhibits
and the Attachments to the Motion for Summary Judgment w/COS
- 8 4/22/08 Petitioner's First Set of Interrogatories to Respondents w/COS
- 9 4/22/08 Petitioner's First Set of Requests for Production to Respondents
- 10 4/23/08 Notice of Depositions w/COS
- 11 4/23/08 Affidavit of Ronny Burkett

See Order of Doyet A Early III, dated August 18, 2008, Consolidating Claims of Cannon, Dallas and Bradley for purposes of Discovery

- 3 Albert H Dallas v Robert L Buchanan and Adele J Pope as Personal Representatives
Case No 2008-CP-02-1426

A Pleadings Notebook containing

- 1 3/05/08 Summons and Petition for Allowance of Claim w/COS
- 2 3/06/08 Order of the Honorable Sue H Roe for Removal
- 3 3/24/08 Answer to Petition for Allowance of Claim w/COS
- 4 4/22/08 First Set of Interrogatories to Be Answered by Respondents Propounded
on Behalf of Petitioner Albert H Dallas

- 5 4/22/08 First Request for Production of Documents to the Respondents
Propounded on Behalf of Petitioner Albert H Dallas w/COS for 4 & 5
- 6 4/23/08 Affidavit of Albert H Dallas

See Order of Doyet A Early III, dated August 18, 2008, Consolidating Claims of Cannon, Dallas and Bradley for purposes of Discovery Also see original discovery documents contained in file

[If requested, we will be glad to discuss this matter at a weekly meeting]

- 4 File of Robert L Buchanan, Jr and Other, Plaintiffs vs Cannon, Dallas, Bradley and Hammond, Defendants
Case Number 2008-CP-02-322

Contains

A Pleadings Notebook Containing

- 1 3/19/08 Summons and Complaint for Declaratory Judgment, Injunction, Delivery of Files and Related Equitable Relief Including Emergency Relief
- 2 4/23/08 Answer of William Hammond
- 3 3/31/09 Acceptance of Service of William Hammond

B Correspondence from Mr Hammond

C Notes from Mr Hammond to Sonny Jones and Grace Lewis Re Grantor Trust Issues

D Letter of James D Bailey dated Oct 8, 2008 describes current status of these cases

This case was commenced by Pope and Buchanan as PR/Trustees on March 19, 2008 related to interference by Defendants Since Hammond's termination by Court Order on August 10, 2007 and the respective resignations of Cannon on August 10, 2007 and D&B on Nov 20, 2007 problems asserted in Complaint

Dallas, Bradley and Cannon, working with Hammond, have since their respective resignations attempted to directly and indirectly interfere with the operation of the Trust, the Estate and JBE, Inc, in at least the following particulars

- a By asserting, through counsel, that they are still Trustees, thus interfering with Plaintiffs' ability, and challenging their authority, to file income tax returns for JBE, Inc , the Estate and the Trust (This problem is exacerbated by the fact that the former Trustee/PRs failed to identify the assets of the Trust and the Estate or account)
- b By overtly challenging, after February 1, 2008, the authority of Plaintiffs to act

with respect to Geronimo, which is owned (at least) 51% by the 2000 Trust and the Artist's share, all of which belongs to the Estate of James Brown (Such actions are directly interfering with, and challenging, the authority of Plaintiffs to terminate David G Cannon as Tax Matters partner of this Brown Entity)

- c By asserting that they are Trustees, and thus (at least part) owners of JBE, Inc , directly interfering with the preparation of tax returns and other administration by Plaintiffs of JBE, Inc
- d By directly challenging the authority of Plaintiffs, thereby interfering with the Application for Charitable Recognition of The James Brown "I Feel Good" Trust, an application they failed to prepare for more than 7 years
- e By failing to deliver the files of William Shearer, Powell Goldstein and Greenberg Traurig (pre-August 10, 2007) as they were ordered to do

[If requested, we will be glad to discuss this matter at a weekly meeting]

- 5 File of Joseph M Turner d/b/a Turner Studios v C A Reid and Estate
Richmond County, GA Case Number 083457

Contains

- A Thrd-party Complaint of C A Reid
- B Answer of Defendant Albert H Dallas as Executor
- C Order for Hearing for Monday, October 29, 2007 [Prior to resignation of Dallas]

This case was commenced on or about September 21, 2007 when Dallas and Bradley were Trustees Buchanan and Pope as PR/Trustees were not made parties to this proceeding Also see claim of C A Reid, Sr , Memorial Funeral Home

[If requested, we will be glad to discuss this matter at a weekly meeting]

✓ **BOX 123 -CANNON MATTERS**

This file contains 5 Cannon Matters pleadings notebooks While it began with various pleadings related to Cannon, the later notebooks contain mostly matters related to the Cannon Appeal, now pending in the South Carolina Court of Appeals Notebooks and documents are described below

Current Caption is

State of South Carolina, In the Court of Appeals, Appeal from Aiken County Court of Common Pleas, The Honorable Doyet A Early, III Presiding, Case No 2007-CP-02-0122, Ex Parte David G Cannon, Appellant, Ex Parte Georgia Attorney General's Office, South Carolina

Attorney General's Office, Terry Brown, Romunzo Brown, Forlando Brown, Darren Lumar, M&T, Tommie Rae Hynie Brown, Stephen L. Slotchiver, the GAL of James B [REDACTED], Larry Brown, Daryl Brown (individually and on behalf of his minor children Lindsey B. and Janise B.), Vanisha Brown, Deanna J. Brown Thomas (individually and on behalf of her minor child Jackson B.), Yamma N. Brown Lumar (individually and on behalf of her minor children Sydney L. and Carrington L.), Tonya Brown, Robert L. Buchanan, Jr., and Adele J. Pope, as Special Administrators, Albert Dallas and Alfred A. Bradley, as Personal Representatives of the Estate of James Brown a/k/a James Joseph Brown, Respondents, In Re The Estate of James Brown, a/k/a James Joseph Brown, Respondent

A 5 Pleadings Notebooks

BOOK 1

- 1 08/2007 Ltr from Cannon re Resignation as PR to Est of James Brown
- 2 12/12/07 Order Allowing Review of Cannon's Financial Statement & Tax Returns to Certain Parties w/Email from Judge Early
- 3 12/18/07 Order (Cannon's Contempt of Court)
- 4 12/26/07 Cannon's Motion to Reconsider
- 5 01/17/08 Notice of Appeal (Appeals Order Issuing Sanctions Dated Dec 18, 2007, & Motion to Reconsider Order Issuing Sanctions Dated Jan 16, 2008)
- 6 01/23/08 Ltr from Appellants to SC Court of Appeals w/Petition for Supersedeas & Verification of Cannon
- 7 01/23/08 Appellants Petition for Supersedeas
- 8 01/23/08 Verification of Cannon
- 9 01/24/08 Ltr from SC Court of Appeals to Appellants w/Order of the Court re Petition for Supersedeas
- 10 01/24/08 Order Allowing Any Respondents Interested in Filing a Return to this Matter must Do So by Jan 31, 2008
- 11 01/30/08 Levenson's Clients' Return to Petition for Supersedeas
- 12 01/30/08 M&T's Return to Petition for Supersedeas
- 13 02/01/08 Order (Appellant Posts Bond of \$433,000)
- 14 02/01/08 Ltr from SC Court of Appeals to Appellants w/Order of the Court re Petition for Supersedeas
- 15 02/06/08 Order Clarifying Type of Bond Appellant Could Post
- 16 02/06/08 Order of the Court Clarifying the Previous Order Dated Feb 1, 2008
- 17 02/06/08 Ltr from SC Court of Appeals to Appellants w/Order of the Court Clarifying Previous Order Dated Feb 1, 2008
- 18 02/12/08 Order Granting Letter of Credit Acceptable Means of Satisfying the Bond Requirements
- 19 02/12/08 Return & Opposition of PR/trustees to Motion of Cannon to Permit Sale of Stone Manu Building, 3452 Main St, Columbia, SC

- 20 02/12/08 Appellants' Emergency Petition for Further Clarification
- 21 02/18/08 Return & Opposition of M&T Bank to Motion of Cannon to
[REDACTED] Permit Sale of Stone Manu Building, 3452 Main St , Columbia,
 SC
- 22 02/28/08 Motion to Be Relieved as Counsel for Appellant & for Extension
 of Time in Which to File Initial Brief
- 23 03/03/08 Return & Opposition by Levenson's Clients to Motion to Be
 Relieved as Counsel for Appellant

Book 2

- 24 03/03/08 Ltr from Appellants to SC Court of Appeals Asking 30 Day Ext of
 Initial Brief
- 25 03/05/08 Ltr from SC Court of Appeals to Appellants re Ext of Appellants
 Initial Brief Not Necessary
- 26 03/21/08 Ltr from Office of Attorney General to SC Court of Appeals
 (Informal Return to Motion to Be Relieved as Counsel)
- 27 03/24/08 M&T's Return to Motion to Be Relieved as Counsel
- 28 03/26/08 Appellants' Motion in Objection to Motion to Be Relieved as
 Counsel
- 29 06/30/08 Ltr from SC Court of Appeals to Appellants (Order Granted
 Appellant Has 30 Days to Acquire New Counsel)
- 30 07/31/08 Ltr from SC Court of Appeals to Cannon re Acquiring the
 Transcript within 10 Days
- 31 08/08/08 Ltr from Cannon to SC Court of Appeals w/his correspondence re
 Transcripts
- 32 09/09/08 Ltr from PR/Trustees to SC Court of Appeals w/Motion to Dismiss
 or Consolidate, Memorandum in Support of Motion, & Affidavit
 of Adele Pope
- 33 09/09/08 PR/Trustees' Motion to Dismiss or Consolidate & Expedite
 Cannon's Appeal
- 34 09/09/08 PR/Trustees' Memorandum in Support of Motion to Dismiss or
 Consolidate & Expedite Cannon's Appeal
- 35 09/09/08 Affidavit of Adele Pope
- 35a 9/25/08 Respondents Pope and Buchanan's Reply to Appellants Dallas and
 Bradley's Return to Motion to Dismiss or Consolidate and
 Expedite Cannon's Appeal w/POS
- 36 10/10/08 Ltr from Cannon to Court of Appeals re Status of Transcripts
- 37 10/15/08 Ltr from SC Court of Appeals to Hayes re Dismiss Motion to
 Dismiss or Consolidate
- 37a 10/15/08 Order of the Honorable Jasper Cureton Re Letter of Credit
- 38 10/16/08 Ltr from Bailey to Court of Appeals re Transcripts
- 39 10/17/08 Motion for Extension of Time in Which to File and Serve

- 40 10/25/08 Appellant's Initial Brief and Designation of Matter
Respondents Pope & Buchanan's Motion to Strike David G
Cannon's October 17 Motion for Extension of Time w/Ltr Filing
37-39
- 41 10/25/08 Respondents Pope & Buchanan's Return to Appellant David G
Cannon's October 17 Motion for Extension of Time

BOOK 3

- 42 10/25/08 Joint Affidavit of Buchanan & Pope Opposing Cannon's Motion
for Extension of Time and Supporting Buchanan and Pope's
Motion to Strike

BOOK 4

- 43 10/27/08 Ltr from Court of Appeals to Warner Granting Extension of Time
to File Initial Appellant's Brief
- 44 11/03/08 Appellant's Return to Pope & Buchanan's Motion to Strike and
Traverse to Return of Pope and Buchanan in Opposition to
Appellant's Motion for Extension
- 45 11/6/08 Respondents Pope and Buchanan's Reply to Appellant Cannon's
November 3 Return to Pope and Buchanan's Oct 25 Motion to
Strike and Return to Cannon's Nov 3 Traverse to Return of Pope
and Cannon [Buchanan] in Opposition to Appellant's Motion for
Extension of Time
- 46 11/26/08 Initial Brief of Appellant
- 46a 11/26/08 Designation of Matter of Appellant w/POS
- 47 12/24/08 Respondents Robert L. Buchanan, Jr. and Adele J. Pope
Designation of Matter to Be Included in the Record on Appeal
- 48 12/24/08 Initial Brief of Respondents Robert L. Buchanan, Jr. and Adele J.
Pope w/POS and Filing Letter
- 49 1/5/09 Initial Reply Brief of Appellant and Supplemental Designation of
Matter of Appellant w/COS
- 49a 1/5/09 Motion for Extension of Time W/pos
- 50 1/8/09 Respondents Buchanan and Pope's Motion to Strike Appellant
Cannon's Supplemental Designation Dated January 5, 2009 and
Portions of Cannon's January 5 Initial Reply Brief
- 51 1/12/09 Initial Brief of Creditor/Respondent M&T Bank
- 52 1/12/09 Designation of Matters to Be Included in the Record on Appeal
w/POS
- 53 1/15/09 Motion to Strike Creditor/Respondent M&T Bank's Initial Brief
and Designation of Matter w/COS
- 54 1/19/09 Return to Respondents Pope and Buchanan's Motion to Strike

- 55 1/20/09 Appellant's Supplemental Designation of Matter and to Strike Certain Portions of Appellant's Initial Reply Brief
Motion to File Initial Brief and Designations of Matters of Creditor/Respondent M&T Bank out of Time and Return to Appellant's Motion to Strike M&T's Brief and Designation w/POS and Filing Letter

BOOK 5

- 56 1/20/09 Initial Brief of Creditor/Respondent M&T Bank
57 1/20/09 Designation of Matters to Be Included in the Record on Appeal w/POS for 47 and 48
58 1/23/09 Respondents Buchanan and Pope's Reply to Appellant Cannon's Return to Respondents Buchanan and Pope's January 8 Motion to Strike Appellant's Supplemental Designation and Portions of Appellant's Initial Reply Brief w/POS and Filing Letter
59 1/28/09 Order of the Honorable Jasper M Cureton
60 2/9/09 Agreement to File Supplemental Record Including Supplemental Designation of Matter of Respondents Robert L Buchanan, Jr and Adele J Pope w/POS
61 2/11/09 Appendix to Record Supplemental Record on Appeal w/POS and Filing Letter
62 2/11/09 Letter to Jan L Warner Re Denying Petition Dtd Feb 10, 2009
63 2/11/09 Letter to the Honorable Jeanette Barber from Appellant's Attorney Re Supplemental Record and Agreement of Counsel
64 2/19/09 Motion for Bond During Appeal Pursuant to Rule 230(a), SCACR and Memorandum of Law in Support Thereof w/COS Dtd 2/19/09 and 2/26/09
65 2/26/09 Rule 211 Certification w/POS
66 2/26/09 Letter of the Honorable Jeanette Barber to Jan L Warner Re Motion of Bond During Appeal
67 2/27/09 Final Brief of Respondents Robert L Buchanan, Jr and Adele Pope w/POS and Filing Letter
68 3/2/09 Return to Motion for Bond
69 3/3/09 Return of Respondents Buchanan and Pope in Opposition to Cannon's Motion for Bond During Appeal Pursuant to Rule 230(a), SCACR w/POS and Filing Letter
70 3/9/09 Return of Respondent M&T Bank in Opposition to Cannon's Motion for Bond During Appeal Pursuant to Rule 230(a), SCACR w/COS
- 2 Motion for Expedited Hearing dated March 23, 2009, with supporting documents
3 Notice of Appearance of Jan Warner, October 17, 2008

- 4 Miscellaneous correspondence
- 5 Certification dated March 17, 2009
- 6 Confidential subpoena, order and superseding Order with correspondence
- 7 Certificate of compliance dated March 19, 2009
- 8 Order Relieving Counsel dated March 6, 2009 (Circuit Court relieves McAngus, Goudelock & Courie, LLC, and substitutes Warner, Payne & Black, LLP, as counsel for Cannon)
- 9 Final Brief of Appellant

✓ **BOX 124 - CANNON/FARR – JAMES BROWN ENTERPRISES, INC**

This file consists of documents delivered by Phil Farr at the November 15/20, 2007 hearing Including

- A 1999
 - 1 James Brown Form 1040 Individual Tax Return, 1999 Form 1040-SC Individual Tax Return
 - 2 JBE, Inc 1999 Balance Sheet, 1999 Income Statement, 1999 Trial Balance, 1999 Detailed General Ledger, Form 1120 Corporate Tax Return, Form SC-1120 Corporate Tax Return
- B 2000

JBE, Inc 2000 Balance Sheet, 2000 Income Statement, 2000 General Ledger Trial Balance, 2000 General Ledger, 2000 Detailed General Ledger, Form 1120 Corporate Tax Return, Form SC-1120 Corporate Tax Return
- C 2001
 - 1 James Brown 2001 Form 1040 Individual Tax Return, 2001 Form 1040-SC Individual Tax Return
 - 2 JBE, Inc 2001 Form 1120 Corporate Tax Return Plus additional documents
- D 2002
 - 1 James Brown 2002 Form 1040 Individual Tax Return, 2002 Form 1040-SC Individual Tax Return
 - 2 JBE, Inc 2002 General Ledger Trial Balance, 2002 General Ledger Working Trial Balance, 2002 Check Register, 2002 Check Register, 2002 Chart of Accounts, 2002 Cash Receipts Journal, 2002 Customer Ledgers, 2002 Purchase Journal, 2002 Cash Disbursements Journal, 2002 Vendor List, 2002 Vendor Ledgers, 2002 Payroll Journal, 2002 Payroll Register,

2002 Payroll Tax Report, 2002 Quarterly Earnings report, 2002 Yearly earnings report, 2002 plain paper W-2s, 2002 Account Variance, 2002 Detailed General Ledger, 2002 Form 1120 Corporate Tax Return, 2002 Form SC-1120 Corporate Tax Return

E 2003

JBE, Inc 2003 General Ledger Trial Balance, 2003 Working Trial Balance, 2003 Detailed General Ledger, Form 1120 Corporate Tax Return, Form SC-1120 Corporate Tax Return, 2003 check Register, 2003 Chart of Accounts

F 2004

JBE, Inc 2004 General Ledger, 2004 Check Register, 2004 Vendor Ledgers, 2004 General Ledger, 2004 Account variance, 2004 Vendor Master File List, 2004 Vendor Master File List

G 2005

JBE, Inc 2005 Balance Sheet, 2005 Income Statement, 2005 General Journal, 2005 Detailed General Ledger, Form 1120 Corporate Tax Return, Form SC-1120 Corporate Tax Return, 2005 Working Trial Balance, 2005 Chart of Accounts, 2005 Check Register, 2005 Employee List-plain paper W2s, 2005 Vendor List, 2005 Customer List/Customer Ledger

NOTE As noted on top of box, the 2006 Report was removed and used as an exhibit at the hearing and has not been returned

✓ **BOX 125 -ADDITIONAL CANNON DOCUMENTS**

Additional documents related to David G Cannon, including

- A Original documents
- B Manila folder entitled "David G Cannon" bearing various numbers between 04800 and 05000
- C Red Rope folder containing note of documents provided to Angela Kirby from box 31 of David Cannon, October 10, 2007, including
 - 1 Regions Bank statements, 7th Decade 2004 Income Tax Return, 7th Decade 2003 Income Tax Return, and other docs bearing numbers 22120 to 22226
 - 2 payment vouchers and tax records bearing numbers 22227 to 22244
 - 3 JBE Inc Regular account 39-3300-1562 Regions Bank, 2000, including copies of various checks, bearing numbers 22245 to 22442
 - 4 JBE Inc Regular account 39-3300-1562 Regions Bank, 2001, including copies of various checks, bearing numbers 22443 to 22605

- 5 JBE Inc Regular account 39-3300-1562 Regions Bank, 2002, including copies of various checks, bearing numbers 22606 to 22829
- 6 JBE Inc Account Reconciliation and bank statements, 2003, bearing numbers 22849 to 23120 (Not organized in sequence)
- 7 JBE Inc Account Reconciliation and bank statements, 2004, bearing numbers 23181 to 23432

✓ **BOX 126 - DALLAS/BRADLEY APPEAL**

The following matter is now pending in the South Carolina Court of Appeals and awaiting oral argument. The caption is as follows: 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, Case No. 2007-CP-02-0122, Albert H. Dallas and Alfred A. Bradley, Trustees of the Irrevocable Trust Agreement of James Brown, Appellants, vs. Adele J. Pope and Robert L. Buchanan, Jr., Putative Trustees of the Irrevocable Trust Agreement of James Brown, Respondents.

Contents delivered include

- 1 Pleadings Notebooks (3)

BOOK 1

- | | | |
|----|---------|--|
| 1 | 3/10/08 | Notice of Appeal of the November 20, 2007 and March 7, 2008 Orders Re Resignation as Trustees and Appointment of Trustees |
| 2 | 3/21/08 | Ltr of Richstad to Byrd Re Receipt of Notice of Appeal Dated March 7, 2008 |
| 3 | 3/27/08 | Ltr of Bailey to Richstad Re Motion to Dismiss or Stay with Related Documents |
| 4 | 3/27/08 | Respondents Motion to Dismiss or Stay, and for Related Relief w/POS |
| 5 | 3/27/08 | Respondents Memorandum in Support of Motion to Dismiss or Stay, and for Related Relief w/POS |
| 6 | 3/27/08 | Affidavit of Robert L. Buchanan, Jr., w/POS |
| 7 | 4/14/08 | Respondent Personal Representatives' and Trustees' Reply to Return of Appellants to Motion to Dismiss or Stay Appeal and Correct Caption w/POS |
| 8 | 5/21/08 | Respondents' Motion to Dismiss or Stay Appeal and Correct Caption |
| 9 | 5/21/08 | Respondents' Motion to Dismiss or Stay and Correct Caption (Appeal of April 8, 2008 Order) w/POS |
| 10 | 5/21/08 | Affidavit of Louis Levenson |
| 11 | 6/10/08 | Appellants' Motion for Extension of Time to File Brief |

- 12 7/9/08 Order of Judge Cureton for Temporary Emergency Stay
- 13 7/9/08 Emergency Motion to Enforce Stay
- 14 7/11/08 Motion of Respondents to Lift Stay w/POS
- 15 7/11/08 Respondents' Return to Appellant's Motion to Enforce Stay with Attached Joint Affidavit of RLB and AJP w/POS

Book 2

- 16 7/11/08 Ltr to Richstad from James Richardson Re Motion to Appear as Amicus Curiae
- 17 7/11/08 Motion to Appear as Amicus Curiae
- 18 7/11/08 Ltr to Richstad from Attorney General Re Allowing Attorney General to Intervene in Appeal
- 19 7/14/08 Ltr to Richstad from Attorney General Re Motion of Attorney General to Intervene
- 20 7/14/08 Respondents' Return to Motion of Attorney General to Intervene with POS
- 21 7/14/08 Ltr to Richstad from Tressa Hayes Re Amended Return to Motion of AG
- 22 7/14/08 Respondents' Amended Return to Motion of Attorney General to Intervene with POS
- 23 7/14/08 Ltr to Richstad from Byrd Re Sending Irrevocable Trust
- 24 7/14/08 Ltr to Richstad from Byrd Re Reply to Respondents' Emergency Motion and Appellants' Return to Respondents' Motion to Lift Stay
- 25 7/14/08 Reply to Respondents' Emergency Motion to Enforce Automatic Stay with POS and Exhibits
- 26 7/14/08 Appellants' Return to Respondents' Motion to Lift Stay with POS
- 27 7/14/08 Ltr to Richstad from James Richardson Re Emergency Hearing
- 28 7/14/08 Order of Jasper Cureton Lifting Stay, Allowing Trustees to Remain and Granting Motion to Appear Amicus Curiae, Orders Expedition of Appeal
- 29 8/12/08 Initial Brief of Appellants w/POS
- 30 8/12/08 Designation of Matter to Be Included in the Record on Appeal w/POS
- 31 8/29/08 Letter from Respondents' Attorney to the Honorable Kenneth A Richstad Filing 32 and 33
- 32 8/29/08 Initial Brief of Respondents
- 33 8/29/08 Respondents' Counterdesignation of Matter to Be Included in the Record on Appeal w/POS
- 34 9/8/08 Initial Reply Brief
- 35 9/9/08 Letter to the Honorable Kenneth A Richstad from Tressa T H Hayes Filing 36, 37 and 38

- 36 9/9/08 Respondents' Motion to Dismiss or Consolidate and Expedite Cannon's Appeal w/POS
- 37 9/9/08 Respondents' Memorandum in Support of Motion to Dismiss or Consolidate and Expedite Cannon's Appeal w/POS

Book 3

- 38 9/9/08 Affidavit of Adele J Pope, with Attachments and POS
- 39 9/15/08 Appellant's Return to Respondents' Motion to Consolidate
- 40 09/25/08 Respondents Pope & Buchanan's Reply to Appellants Dallas & Bradley's Return to Motion to Dismiss or Consolidate & Expedite Cannon's Appeal w/ COS & Ltr
- 41 09/26/08 Motion to Strike Matter Designated by Respondents from the Record on Appeal w/POS
- 42 10/03/08 Respondents Pope & Buchanan's Return to Appellants Dallas & Bradley's Sept 26 Motion to Strike Matter Designated by Respondents w/POS
- 43 10/03/08 Affidavit of Adele J Pope Accompanying Respondents' Return to Appellants' Sept 26 Motion to Strike w/POS
- 44 10/09/08 Respondents Pope and Buchanan's Return to Appellants Dallas and Bradley's Oct 6 Supplemental Motion to Strike Matter Designated by Respondents w/POS
- 45 10/09/08 Affidavit of Adele J Pope Accompanying Respondents' Return to Appellants' Oct 6 Supplemental Motion to Strike
- 46 10/27/08 Order of the Honorable Jasper M Cureton Denying Respondents Motion to Strike Matter Granting Supplemental Motion to Strike Matter
- 47 11/6/08 Letter from Appellants' Attorney to the Honorable Kenneth A Richstad Filing 48 and 49
- 48 11/6/08 Respondents' Amended Counterdesignation of Matter to Be Included in the Record on Appeal w/POS
- 49 11/6/08 Amended Initial Brief of Respondents w/POS

- 2 Record on Appeal, Volume I
- 3 Record on Appeal, Volume II
- 4 Record on Appeal, Volume III
- 5 Record on Appeal, Volume IV
- 6 Record on Appeal, Volume V
- 7 Record on Appeal, Volume VI
- 8 Supplemental Record on Appeal (bound with Volume I)

✓ **BOX 127 - DALLAS/BRADLEY APPEAL BOX 2**

Includes

- 1 Red Rope folder, Designation of Matter – Respondent
- 2 2 Red Rope folders, Designation of Matter – Appellant

✓ **BOX 128 - CANNON/DALLAS/BRADLEY LITIGATION- RELATED DOCUMENTS**

This file consists largely of documents removed from boxes 1-83 by counsel as relevant to one or more Dallas/Cannon/Bradley litigation matters

Includes

- 1 Violet original file, Brown, James (biography), (from Dallas Box 4) Containing documents related to subject from pre-1985 through at least 1993
- 2 Violet original file, James Brown PolyGram Records Relates to US District Court Civil Action No 3 92-11-95-0 of James Brown v AC&R Advertising, Inc , and Molson Breweries USA, Inc , Defendants and Third-Party Plaintiffs v Polygram, Inc , PolyGram Records, Inc , and PolyGram Group Distribution, Inc , Third-Party Defendants Including Motion of Plaintiff James Brown to strike certain defenses and for partial summary judgment dtd 2/19/1993, with Affidavits of Friedman and Brown and Exhibits A-S, Affidavit of James Brown dated 2/22/1993, Plaintiff's Memorandum in support of summary judgment (From Dallas Box 4)
- 3 Violet original file, James Brown Terry Cox Proposal Includes bound color copy of Creating Wealth for the James Brown Trust, May 2007, with handwritten corrections on page 5 (From Dallas Box 4)
- 4 Violet original file, James Brown Dolls for Japan 7/2003 (From Dallas Box 3)
- 5 Correspondence from Albert Dallas to Jay Ross with photos re use of image (from Dallas Box 3)
- 6 Violet original file, Laurecie Martinez Production Agreement Contains Production Agreement bearing fax dated 10/9/1996 (From Dallas Box 1)
- 7 Geronimo document dtd 1/12/04 with attachment (From Dallas Box 1)
- 8 Orange folder, JMA Master Prints contract Contains contract draft and correspondence from Jay B Ross and Associates, PC, to Buddy Dallas, 1992 (From Dallas Box 1)
- 9 Violet original file, James Brown Movie Deal Contains correspondence from

Universal Attractions to Buddy Dallas with draft agreement, May 18, 1989 (From Dallas Box 1)

- 10 Violet original file, James Brown Internet Problems 11/2000 AHD Contains correspondence dated 11/2000 related to subject (From Dallas Box 1)
- 11 Manila folder, Friedman, Leon, JBE Contains various records and original correspondence between 1999 and 2005, including May 25, 2005 James Brown story correspondence
- 12 Manila folder, JB Corporate Tax Returns 2000
- 13 Manila folder, JB Corporate Tax Returns 2001
- 14 Manila folder, JB Corporate Tax Returns 2003
- 15 Manila folder, JB Corporate Tax Returns 2004
- 16 Manila folder, JB Personal Tax Returns 2000
- 17 Manila folder, JB Personal Tax Returns 2001
- 18 Manila folder, JB Personal Tax Returns 2002
- 19 Manila folder, JB Personal Tax Returns 2003
- 20 Manila folder, JB Personal Tax Returns 2004
- 21 Correspondence from Leon Friedman dtd 1/4/04 re bills, with attached bills, invoices, etc
- 22 Excerpts from James Brown Rhino Entertainment Grateful Dead
- 23 Excerpts from June 4, 1999 portion of TIAA Indenture
- 24 Additional loose JBE and JBE, Inc , Tax Returns and extensions to file
- 25 Proposed Movie contract with movie option payments 21731-21815, and additional documents re movie
- 26 Pay records from 2002
- 27 Doll distribution information

✓ **BOX 129 - MISCELLANEOUS DOCUMENTS**

Including multiple copies of Estate Tax Return (NOTE Missing letter sent to correct Accountant's inadvertent attachment of Post-Death Schedule B given to him by Buddy Dallas), Request for Taxpayer ID Number, Global Gaming information, Red Rope counsel documents, Forlando Brown Suit, copied for plaintiff in Forlando Brown case, 2008 Income Tax matters for accountant, February 27, 2008 request for financial information from Cannon, unsorted miscellaneous and current documents for filing, includes confidential information, includes , Terry Cox folder, **Red Rope** documents related to Few/Gilreath suits, including original reports of Special Administrators, Printout of US Copyright Search, Additional Gift Affidavits, Brown J Administration, Costs Paid as per Court Order, 2008 African American History Calendar, returned envelope, Roosevelt Johnson, Greenberg Traurig disallowance of claim and correspondence, IRS correspondence from Phil Farr, May 5, 2008, and other tax documents, correspondence from former box 2 to Leon Friedman re James Brown life story, Number 04555-04596, Aiken County tax parcel map,

✓ **BOX 130 - WILL/TRUST/HEIRS, CASE #872**

Caption is

State of South Carolina, County of Aiken, In the Court of Common Pleas, Case Number 2008-CP-02-0872, 1 DARYL J BROWN, individually and on behalf of his minor children, LINDSEY DELORES BROWN and JANISE [REDACTED] A B [REDACTED], 2 VANISHA BROWN, 3 LARRY BROWN, 4 DEANNA J BROWN THOMAS, individually and on behalf of her minor child JASON BROWN LEWIS, 5 YAMMA N BROWN, individually and on behalf of her minor children SYDNEY L [REDACTED] and CARRINGTON L [REDACTED] and 6 TONYA BROWN, Plaintiffs, v ADELE POPE as Personal Representative of the Estate of James Brown and as Trustee of the purported Irrevocable Trust of James Brown dated August 1, 2000, ROBERT L BUCHANAN, JR as Personal Representative of the Estate of James Brown and as Trustee of the purported Irrevocable Trust of James Brown dated August 1, 2000, TOMMIE RAE BROWN, as the potential heir of James Brown, JAMES [REDACTED] B [REDACTED] as the potential heir of James Brown, CINNAMON NICOLE MERNICKLE PARIS as the potential heir of James Brown, LARHONDA PETITT as the potential heir of James Brown, JEANETTE MITCHELL, as the potential heir of James Brown, TERRY BROWN, as the potential heir of James Brown, ROMUNZO BROWN as the potential heir of James Brown, FORLANDO BROWN, as the potential heir of James Brown, HENRY DARGAN MCMASTER in his capacity as ATTORNEY GENERAL OF THE STATE OF SOUTH CAROLINA, JANE DOE and JOHN DOE numbers I, II, III, IV as potential heirs and/or devisee and/or beneficiaries of James Brown and as representatives of all other persons known or unknown claiming to be an heir and/or devisee and/or beneficiary of James Brown

1 Includes 3 Pleadings Notebooks, as follows

BOOK 1

- 1 12/26/07 Petition to Set Aside Informal Probate w/COS
- 2 12/26/07 Summons and Petition to Set Aside Trust w/COS
- 3 1/2/08 Petition to Set Aside Trust/acknowledgment of Service (Robert Rosen) w/COS
- 4 1/3/08 Petition to Set Aside Trust/acknowledgment of Service (James Griffin) w/COS
- 5 1/3/08 Summons and Petition to Set Aside Trust on Behalf of Cinnamon Nicole Mernickle Paris and LaRhonda Pettitt w/COS
- 6 1/3/08 Summons and Petition to Set Aside Informal Probate on Behalf of Cinnamon Nicole Mernickle Paris and LaRhonda Pettitt w/COS
- 7 1/3/08 Terry Brown's Response to Petition to Set Aside Informal Probate
- 8 1/4/08 Petition to Set Aside Informal Probate/Acknowledgment of Service (Robert Young) w/COS
- 9 1/4/08 Summons and Petition to Set Aside Informal Probate on Behalf of Jeanette Mitchell w/COS
- 10 1/4/08 Summons and Petition to Set Aside the Trust on Behalf of Jeanette Mitchell w/COS
- 11 1/10/08 Motion to Compel
- 12 1/13/08 Amended Petition to Set Aside Informal Probate and Amended Petition to Set Aside Trust and for Appointment of an Administrator in Intestacy
- 13 1/15/08 Motion to Dismiss or Consolidate and for Related Relief
- 14 01/23/08 Amended Petition to Set Aside Informal Probate And Amended Petition to Set Aside Trust and for Appointment of Administrator in Intestacy
- 15 02/05/08 First Requests to Admit of Defendant Estate James Brown and Trustees of the James Brown 2000 Trust
- 16 02/05/08 First Set of Interrogatories of Defendant Estate of James Brown and Trustees of the James Brown 2000 Trust
- 17 02/05/08 Pod Requests to Admit and Interrogatories
- 18 02/05/08 Motion to Dismiss (w/POD)
- 19 02/07/08 Responsive Pleadings of Terry Brown, Romunzo Brown, and Forlando Brown (Demand for Jury Trial) w/COS
- 20 2/13/08 Emergency Motion for Stay of Discovery in Will Contest, Trust Contest, and Elective Share until Funds Received, Termination of Former PR/Trustees Confirmed, Appointment of These PR/Trustees Confirmed, Gift Affidavits Received, Initial Estate Taxes Paid, and Priority Expenses Paid or Provided for
- 21 02/14/08 Return in Opposition to Motion to Dismiss Filed by the PRs and Trustees
- 22 2/28/08 Memorandum in Support of Motion to Acquire and Test DNA Samples

- 23 02/28/08 Return in Opposition to Motion to Dismiss Filed by the PRs and Trustees w/COS
- 24 2/29/08 Answer to the Cross-claim of Cinnamon Nicole Mernickle Paris and LaRhonda Petit
- 25 2/29/08 Proof of Delivery
- 26 3/20/08 Return to Motion for Relief from Order Dated August 10 2007
- 27 3/20/08 Amended Return to Motion for Relief from Order Dated August 10, 2007
- 28 3/20/08 Plaintiff's Response to First Request to Admit of Defendant Estate of James Brown and Trustees of the James Brown 2000 Trust
- 29 3/20/08 Plaintiff's Response to First Set of Interrogatories of Defendant Estate of James Brown and the Trustees of the James Brown 2000 Trust
- 30 3/21/08 Response to Amended Petition to Set Aside Informal Probate and Amended Petition to Set Aside Trust and for Appointment of an Administrator in Intestacy
- 31 3/26/08 Answer and Counterclaim of Personal Representatives and Trustees to Amended Petition
- 32 3/27/08 Motion for Extension of Time to Review and Analyze Items on Christie's Sale Selection List
- 33 3/27/08 Defendant Tommie Rae Brown's Response to Amended Petition to Set Aside Informal Probate and Amended Petition to Set Aside Trust and for Appointment of an Administrator in Intestacy
- 34 3/27/08 Objection to Motion to Admit David Bell Pro Hac Vice in Case No 2008-CP-02-0827

Book 2

- 35 4/11/08 Response to Petition to Revoke Attorney David Bell's Pro Hac Vice Admission
- 36 4/14/08 Affidavit of Adele J Pope
- 37 4/22/08 Response of James Brown II, a Minor by His Guardian Ad Litem, Stephen Slotchiver to Motion of Adele J Pope And Robert L Buchanan, Jr , as Personal Representatives of the Estate James Brown, and Trustees of the James Brown 2000 Irrevocable Trust (PR/Trustees)
- 38 4/23/08 Reply to Return of Adele J Pope and Robert L Buchanan Jr as Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust (PR/Trustees) to Motion to Revoke Pro Hac Vice Admission to David Bell
- 39 5/13/08 Plaintiff's Notice of Filing Publisher's Affidavit for Service by Publication
- 40 5/14/08 Verification

- 41 5/21/08 Motion for the Execution of Hippa Medical Release Forms w/COS and Proposed Order
- 42 5/21/08 Motion for Approval of Scheduling Order and Related Relief
- 43 5/21/08 Returns to Motions of Plaintiffs Dated May 21, 2008
- 44 5/23/08 Responsive Pleadings of Terry Brown, Romunzo Brown and Forlando Brown (Demand for Jury Trial)
- 45 5/27/08 Motion to Strike
- 46 7/25/08 Order Approving and Setting Conditions of Interim Payments of Educational Benefits
- 47 8/1/08 Motion to Alter or Amend And/or Reconsider Order Approving and Setting Conditions of Interim Payments of Educational Benefits and for Evidentiary Hearing Thereon (Missing) and COS
- 48 8/7/08 Motion to Admit David Bell Pro Hac Vice in Case 2008-CP-02-0872 w/COS
- 49 8/11/08 Objection to Withdrawal of Stipulation
- 50 8/11/08 First Requests to Admit of Defendant PR/Trustees
- 51 8/11/08 First Interrogatories of PR/Trustees to Henry Dargan McMaster, Romunzo Brown, Tommie Rae Brown, Lindsey Delores Brown, Jason Brown Lewis, Forlando Brown, Deanna J Brown Thomas, Yamma N Brown, Vanisha Brown, Tonya Brown, Sydney L [REDACTED], Larry Brown, Larhonda Pettit, Daryl J Brown, Cinnamon Nicole Mernickle Paris, Carrington L [REDACTED], Jeanette Mitchell, Janise [REDACTED] B [REDACTED], Terry Brown, James [REDACTED] B [REDACTED] and Certificate of Service

Book 3

- 52 8/12/08 Objection to Admit David Bell Pro Hac Vice in Case 2008-CP-0872 w/Certificate of Service
- 53 8/13/08 Objection to Romunzo Brown's Motion to Alter or Amend Order Approving and Setting Conditions of Interim Payments of Educational Benefits
- 54 8/13/08 PR/Trustees Return to Motion of Plaintiffs and Others to Alter or Amend And/or Reconsider Order Approving and Setting Conditions of Interim Payments of Educational Benefits w/ Exhibits and COS
- 55 8/18/08 Motion to Require Disclosure of Secret Settlement and for Related Relief
- 56 8/27/08 Response of Terry Brown, Romunzo Brown and Forlando Brown to First Requests to Admit of Defendant PR/Trustees
- 57 9/12/08 Motion for Partial Summary Judgement
- 58 9/15/08 Motion to Dismiss All Causes of Action to Set Aside the James Brown Irrevocable Trust

- 59 9/25/08 PR/Trustees' Response to Motion of South Carolina Attorney General and Others for Stay of Responses and Discovery
- 60 9/30/08 Order Admitting David Bell Pro Hac Vice in Case w/COS
- 61 10/9/08 Motion of Terry Brown, Forlando Brown and Romunzo Brown in Support of Robert Buchanan and Adele Pope's Motion to Dismiss All Causes of Action to Set Aside the James Brown 2000 Irrevocable Trust w/COS
- 62 10/9/08 Terry Brown, Forlando Brown and Romunzo Brown's Support of Robert Buchanan and Adele Pope's Motion for Partial Summary Judgement w/COS
- 63 10/23/08 Order Granting Limited Stay of Certain Discovery
- 2 Folder entitled Original Discovery Documents, Will/Trust/Heirs containing original of discovery documents referenced in pleadings notebooks
- 3 Order dated 10/7/2008
- 4 Confidentiality and Protective Order dated 11/3/2008
- 5 Affidavit of Robert L. Buchanan, Jr., and Adele J. Pope dated 2/27/09
- 6 Emergency Motion dated 2/27/09
- 7 Brief in Opposition to Settlement dated 1/20/09
- 8 Return to Oral Discovery Order
- 9 Correspondence

✓ **BOX 131 - TRANSCRIPTS AND DEPOSITIONS, LEVENSON DISQUALIFICATION, AND OTHER MATTERS**

Contains

- 1 Transcript of Hearing, Case #07-CP-02-0122, February 9, 2007
- 2 Transcript of Hearing, Case #07-CP-02-0122, June 13, 2007
- 3 Transcript of Hearing, Case #07-CP-02-0122, August 10, 2007
- 4 Transcript of Hearing, Case #07-CP-02-0122, September 24, 2007
- 5 Deposition of Deanna Brown Thomas, October 31, 2007
- 6 Deposition of Forlando Jamal Brown, October 31, 2007
- 7 Transcript of Hearing, Case #07-CP-02-0122, December 21, 2007
- 8 Red Rope folder containing Levenson Grievances filed by Brown family members and responses provided by Mr. Levenson

BOX 132 - REMOVAL/APPOINTMENT/ACCOUNTING, CASE #122

See various captions for case Consisting of

- 1 6 initial Pleadings Notebooks Note From March 7, 2007 until November 20, 2007 Buchanan and Pope served as Special Administrators, were not represented by counsel, and participated pro se in their capacities as Special Administrators Books 1–6 containing the following

BOOK 1

- | | | |
|-----|---------|---|
| 1 | 1/24/07 | Emergency Petition for Termination of Appointment and Removal of Personal Representatives and for Emergency Order Restraining All Personal Representatives w/Verification and COS |
| 1a | 1/31/07 | Petition of Tommie Rae Brown for Demand for Bond, Omitted Spouse, & Elective Share |
| 2 | 2/5/07 | Emergency Petition for Appointment of Special Administrator |
| 2a | 2/19/07 | Order of Judge Early Re PRs and SAs |
| 3 | 2/26/07 | Inventory of Items Returned to Personal Representatives on February 24, 2007 at 1 00 pm w/COS |
| 4 | 3/7/07 | Supplemental Order Appointing Special Administrators |
| 5 | 4/2/07 | Objection to Motion to Acquire DNA Samples |
| 6 | 4/5/07 | Motion for Pro Hac Vice Admission with Verified Application for Admission - Pro Hac Vice in the State of South Carolina |
| 7 | 4/9/07 | Notice of Appearance of Ronald A Maxwell w/COS |
| 8 | 4/10/07 | Motion to Modify Order Appointing Special Administrators w/ COS |
| 8a | 4/16/07 | Petition for Accounting (Levenson) |
| 9 | 4/18/07 | Tommie Rae Brown's Return to Motion of Personal Representatives for Appointment of a Guardian Ad Litem |
| 10 | 4/20/07 | Petitioner Tommie Rae Brown's Motion for Continuance W/motion Cover Sheet |
| 11 | 4/20/07 | Subpoena To Janet Creighton c/o Regions Bank |
| 12 | 4/20/07 | Affidavit of Robert N Rosen |
| 13 | 4/25/07 | Report of Special Administrators |
| 14 | 4/25/07 | Summons to Dallas, Bradley & Cannon from Levinson |
| 15 | 5/3/07 | Petitioner Tommie Rae Brown's Brown's Responses to Personal Representatives' First Set to Request for Admission w/COS dtd May 11, 2007 |
| 15a | 5/4/07 | Notice of Filing Proof of Service for Acknowledgment of Service for Dallas and Bradley |
| 16 | 5/14/07 | Petitioner Tommie Rae Brown's Second Request for Production w/COS Dtd May 15, 2007 |

- 17 5/22/07 Petitioners' Second Continuing Interrogatories and Request for Production of Documents to Co-defendant Alfred A Bradley w/COS
- 18 5/22/07 Petitioners' Second Continuing Interrogatories and Request for Production of Documents to Co-defendant Albert H "Buddy" Dallas w/COS
- 19 5/22/07 Petitioners' Second Continuing Interrogatories and Request for Production of Documents to Co-defendant David G Cannon w/COS
- 20 5/30/07 Return to Petition for Accounting
- 21 5/31/07 Stipulation Extending Time to Respond w/COS
- 22 6/1/07 Plaintiffs' Motion for Issuance of Commission to Take a Deposition Out-of-state of Joseph Lizzio w/COS
- 23 6/1/07 Plaintiffs' Motion for Issuance of Commission to Take a Deposition Out-of-state of Jeff Allen w/COS
- 23a 6/5/07 Affidavit of Alfred Bradley
- 24 6/5/07 Motion of Special Administrator w/COS
- 24a 6/7/07 Affidavit of David G Cannon
- 25 6/11/07 Alfred A Bradley's Answers to Petitioners' First Continuing Interrogatories w/COS
- 26 6/11/07 Alfred A Bradley's Responses to Petitioners' First Requests of Production w/Cos
- 27 6/11/07 Albert H Dallas's Answers to Petitioners' First Continuing Interrogatories w/COS
- 28 6/11/07 Albert H Dallas's Responses to Petitioners' First Requests of Production w/COS
- 29 6/11/07 David G Cannon's Answers to Petitioners' First Continuing Interrogatories w/COS
- 30 6/11/07 David G Cannon's Responses to Petitioners' First Requests of Production w/COS

BOOK 2

- 31 6/12/07 Personal Representatives' Memorandum in Response to Motion of Special Administrators
- 32 6/12/07 Report and Recommendation of Special Administrators Regarding the New York Litigation w/COS
- 32a 6/12/07 Affidavit of Albert Dallas
- 33 6/13/07 Brown Children's Motion to Compel Discovery
- 33a 6/17/07 Subpoenas of David G Cannon, Alfred A Bradley, Albert H Dallas, and Terry Brown
- 34 6/18/07 Affidavit of Mary Holmes
- 35 6/22/07 Order Related to Greenberg Traurig

- 36 6/22/07 Order for Issuance of Commission to Take a Deposition Out-of-state of Joseph Lizzio
- 37 6/22/07 Order for Issuance of Commission to Take a Deposition Out-of-state of Jeff Allen
- 38 6/22/07 Order for Issuance of Commission to Take a Deposition Out-of-state of Frank Copsidas w/Form 4 for 36, 37, & 38
- 39 6/25/07 Personal Representatives' First Supplemental Responses to Petitioners' First Requests for Production
- 40 6/25/07 Personal Representatives' First Supplemental Answers to Petitioners' First Continuing Interrogatories w/COS
- 41 6/22/07 Order Related to Access of the Special Administrators (Filed 6/25/07)
- 42 6/27/07 Personal Representatives' Responses to Petitioner's First Requests for Production
- 43 6/27/07 Personal Representatives' Responses to Petitioner's Second Requests for Production
- 44 6/27/07 Personal Representatives' Answers to Petitioner's First Interrogatories w/COS
- 44a 6/28/07 Amended Motion to Acquire and Test DNA Samples (PRs Bradley, Dallas and Cannon)
- 45 7/10/07 Personal Representatives' Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production w/COS
- 46 7/18/07 Subpoena of Andre White
- 47 7/25/07 Petition for Expenses from Council for Petitioners w/COS
- 48 7/25/07 Notice of Deposition of Charles Bobbit w/COS
- 48a 7/26/07 Order to Depose a non Party Witness Inside the State of New York for an Action Pending in the State of South Carolina
- 49 7/27/07 Motion and Recommendation of Special Administrators w/COS
- 49a 7/27/007 Supporting Documentation for Motion and Recommendation of Special Administrators
- 50 7/30/07 Application for Temporary Restraining Order and Petition for Permanent Injunction w/Exhibits & COS
- 51 7/30/07 Motion to Disqualify Counsel (Maxwell and Bell) W/cos (Filed by Levenson)

BOOK 3

- 52 8/1/07 Motion to Compel w/COS
- 53 8/3/07 Stanley G Jackson Appearing for Albert H Dallas and Alfred A Bradley w/COS
- 54 8/3/07 Affidavits of Albert H Dallas, Alfred A Bradley and David G Cannon w/COS

- 55 8/6/07 Subpoenas to SAs Adele Pope and Robert Buchanan
- 56 8/6/07 Subpoenas to PRs Albert H Dallas, Alfred A Bradley, and David G Cannon
- 57 8/7/07 Return by Children and Grandchildren of James Brown to Motion and Recommendation of Special Administrators (Levenson) w/COS
- 58 8/7/07 Return to Petition for Expenses (PRs/Trustees) w/COS
- 59 8/7/07 Bradley, Cannon, and Dallas Second Supplemental Answers to Petitioners' First Continuing Interrogatories
- 60 8/7/07 Alfred A Bradley, David G Cannon, and Albert H Dallas, Esquire's Second Supplemental Responses to Petitioners' First Requests for Production
- 60a 8/7/07 Stephen M Slothchiver, as GAL, for the Minor Child, James Brown, II, Response to Amended Motion to Acquire and Test DNA Samples
- 61 8/7/07 Alfred A Bradley's First Amended Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production w/COS for 59, 60 and 61
- 61a 8/8/07 Motion to Intervene
- 61b 8/9/07 Affidavit of David G Cannon w/Notice of Filing & COS
- 62 8/10/07 Order Confirming Engagement of Counsel for All Plaintiffs in New York Proceeding
- 63 8/10/07 Order (Removing Cannon)
- 63a 8/14/07 Stephen M Slotchiver, as Guardian *Ad Litem*, for the Minor Child, James Joseph Brown, II, Response to Amended Motion to Acquire and Test DNA Samples
- 63b 8/15/07 Order - Plaintiffs' Motion to Compel Discovery (One Copy Signed by Levenson Other Signed by Judge Early)
- 64 8/19/07 Supplemental Order Related to Disbursement of Royalty Proceeds
- 65 8/20/07 Albert H Dallas, Esquire's Amended Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production w/COS for
- 66 8/20/07 Albert H Dallas, Esquire's Third Supplemental Responses to Petitioners' First Requests for Production
- 67 8/20/07 Albert H Dallas, Esquire's Third Supplemental Answers to Petitioners' First Continuing Interrogatories
- 68 8/20/07 Alfred A Bradley's Amended Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production
- 69 8/20/07 Alfred A Bradley's Third Supplemental Responses to Petitioners' First Requests for Production
- 70 8/20/07 Alfred A Bradley's Third Supplemental Answers to Petitioners' First Continuing Interrogatories w/COS for 65, 66, 67, 68, 69, 70

- 71 8/21/07 Verification of Alfred A Bradley
- 72 8/22/07 Supplemental Order w/COS
- 72a 8/22/07 Order - Plaintiffs' Motion to Disqualify Counsel for Carrington and Sydney Lumar
- 72b 8/23/07 Motion for Attachment
- 73 8/24/07 Notice to Take Deposition of Frank Copsidas
- 74 8/27/07 Motion for an Accounting w/COS
- 75 8/27/07 Notice to Take Deposition of Joseph Lizzio w/COS
- 76 8/28/07 Affidavit of Louis Levenson w/COS
- 77 8/29/07 Alfred A Bradley and Albert H Dallas, Esquire's Supplemental Responses to Petitioner Tomi Rae Hynie's Second Requests for Production w/COS
- 77a 8/31/07 Motion to Declare James Brown Enterprises, Inc , an Asset of the Estate and Not of the Irrevocable Trust of James Brown (PR/Trustees Dallas and Bradley)
- 78 8/31/07 Response of David B Bell and Ronald A Maxwell to Motion to Disqualify Counsel for Carrington and Sydney Lumar
- 78a 8/31/07 Supplemental Order w/COS

BOOK 4

- 80 9/4/07 David Cannon's Answers and Responses to Petitioners' Second Continuing Interrogatories and Request for Production w/COS
- 81 9/6/07 Deposition Subpoena Duces Tecum
- 82 9/6/07 Return by Children and Grandchildren of James Brown to Motion to Intervene w/COS
- 83 9/7/07 Notice to Take Deposition of Joseph Lizzio
- 84 9/7/07 Supplement and Addendum to Motion to Account (With Evidence) w/COS
- 85 9/7/07 Reply to Affidavit and Motion for Attorney's Fees on the Motion to Compel w/ COS
- 86 9/12/07 Return to Motion to Intervene
- 87 9/12/07 Report of Special Administrators and Personal Representatives w/ COS for 90 and 91
- 88 9/14/07 Notice of Motion and Motion to Alter or Amend w/COS
- 89 9/17/07 Notice of Appearance on Behalf of David Cannon
- 90 9/20/07 Notice of Motion and Motion for Intervention w/ COS
- 91 9/20/07 Return by Tommie Rae Brown to Motion to Intervene
- 92 9/20/07 Motion to Compel with Attachments
- 93 9/20/07 Notice of Appearance
- 93a 9/20/07 David Cannon's Return to Motion for Accounting and Motion for Attachment
- 94 9/24/07 Confidentiality/Protective Order

- 95 9/24/07 Amended Order - Plaintiff's Motion to Disqualify Counsel for Carrington and Sydney L [REDACTED]
- 96 9/24/07 Consent Order (Regarding Petitioner's Personal Property)
- 97 9/24/07 Additional Recommendations Special Administrators Recommendations Related to David G Cannon and Cannon Entities
- 98 9/28/07 Notice of Motion and Motion for Admission Pro Hac Vice w/ COS
- 98a 10/2/07 Order

BOOK 5

- 99 10/3/07 Response to Motion to Declare James Brown Enterprises, Inc an Asset of the Estate and Not of the Irrevocable Trust of James Brown with COS
- 100 10/3/07 Response of the Office of the South Carolina Attorney General to Motion to Declare James Brown Enterprises, Inc an Asset of the Estate and Not of the Irrevocable Trust of James Brown with COS
- 101 10/04/07 Order Granting Motion to Intervene on Behalf of South Carolina Attorney General Henry D McMaster and Georgia Attorney General Thurbert E Baker with COS
- 102 10/5/07 Order Granting Permission for Grace Evans Lewis to Appear Pro Hac Vice with Attachments and COS
- 103 10/5/07 Response in Opposition to Motion to Declare James Brown Enterprises, Inc an Asset of the Estate and Not of the Irrevocable Trust of James Brown - Amended COS
- 104 10/11/07 Notice of Deposition (To Dianna Brown Thomas) w/COS
- 105 10/11/07 Notice of Deposition of Forlando Brown with COS
- 106 10/16/07 Consent Order
- 106a 10/18/07 Order Substituting Counsel (Drennan)
- 107 10/22/07 Petition for Citation of Contempt w/COS & Exhibits
- 108 10/25/07 Petitioner Tomie Rae Brown's Motion for Summary Judgment w/COS
- 109 10/26/07 Response of David B Bell to the Petition for Citation of Contempt w/COS
- 110 11/2/07 Motion of Special Administrators w/ COS
- 110a 11/5/07 Order Granting Extension of Time Pursuant to SCRCP 6(b) for the Offices of the Attorneys General of South Carolina and Georgia to File Responsive Pleadings
- 111 11/5/07 Petition for Citation of Contempt And/or Sanctions W/attachments & COS (Jackson)
- 111a 11/7/07 Order Allowing Sale of 3687 Wheeler Road
- 111b 11/7/07 Notice of Filing w/Affidavits of Velma Warren Brown and Forlando Brown

- 111c 11/8/07 Affidavit of Tommie Rae Brown in Support of Her Motion for Summary Judgment
- 112 11/9/07 Amendment and Supplement to Motion to Declare James Brown Enterprises, Inc an Asset of the Estate w/Exhibits & COS (Jackson)
- 113 11/9/07 Terry Brown's Response to Motion for Summary Judgment Filed by Tommie Rae Brown w/COS (Bell)
- 114 11/12/07 Notice of Filing Original Discovery by David Bell w/COS
- 115 11/12/07 Amendment to Petition for Removal of Personal Representatives w/COS (Levenson)

BOOK 6

- 116 11/12/07 Motion to Disqualify Attorneys David Bell & Ronnie A Maxwell w/Exhibits & COS (Levenson)
- 117 11/12/07 Return to Petition for Contempt from Stan Jackson w/COS
- 118 11/12/07 Return to Petition for Citation of Contempt from Lewis Levinson w/COS
- 119 11/12/07 Motion to Allow Payment of Funds into Registry of the Court w/ Exhibits & COS (Levenson)
- 120 11/13/07 Objection by the Office of the South Carolina Attorney General to the Motion of the Sas to Engage Counsel to Protect the Interest of the Charitable Trust and to Commingle Assets of the Charitable Trust and the Estate w/COS
- 121 11/13/07 Respondent David G Canon's Supplemental Responses of November 13, 2007 to Petitioners' First Continuing Interrogatories W/COS & Attachments
- 122 11/13/07 Return and Recommendation of Special Administrators
- 122a 11/13/07 Motion to Compel Inspection of Marital Home
- 123 11/14/07 Confidential Plan & Report Re Tangible Personal Property & Personal & Household Effects
- 124 11/14/07 Notice of Motion and Motion to Quash w/ COS
- 125 11/14/07 Response in Opposition to Motion of Special Administrators w/COS
- 126 11/19/07 Motion to Dismiss Amended Petition for Removal w/COS
- 127 11/19/07 Attorney General Thurbert E Baker's Response to Amendment to Petition for Removal of Personal Representatives w/COS
- 128 11/19/07 Motion of Special Administrators w/Attachments, COS and Motion Coversheet
- 129 11/19/07 Order to Compel Inspection
- 130 11/20/07 Notice of Filing w/COS (Bell)

✓ **BOX 133 - REMOVAL/APPOINTMENT/ACCOUNTING, BOX 2**

1 Contains Pleadings Books 7-10 Note These pleadings are for the period

BOOK 7

- 131 11/20/07 Order Allowing Combining of Funds
- 132 11/20/07 Order Accepting Resignation and Appointing Personal
Representatives and Trustees
- 133 11/27/07 Affidavit of Louis Levenson w/Attachments and COS
- 134 11/27/07 Order Sealing Record
- 135 11/28/07 Motion to Review Document under Seal w/COS and Motion
Coversheet
- 136 11/28/07 Affidavit of Adele J Pope w/COS
- 137 11/28/07 Order Granting Extension to South Carolina Attorney General
- 138 11/29/07 Affidavit of Alford A Bradley
- 139 11/29/07 Affidavit of Albert H Dallas
- 140 11/30/07 Attorney General Baker's Motion to Set Aside Order, Dated
November 20, 2007, Appointing Successor Trustees and Successor
Personal Representatives w/Affidavit of Albert Dallas and Other
Attachments
- 141 11/30/07 Affidavit of William F Hammond
- 142 11/30/07 Motion to Vacate, Amend and Reconsider Order Accepting
Resignations as Trustees and Appointing New Trustees
W/Affidavit of Alfred A Bradley and Other Attachments
- 143 11/30/07 Amendment to Attorney General Baker's Motion to Set Aside
Order, Dated November 20, 2007, Appointing Successor Trustees
and Successor Personal Representatives w/COS
- 144 11/30/07 Motion of South Carolina Attorney General Henry D McMaster
and Georgia Attorney General Thurbert E Baker to Alter or
Amend Judgment and/or for Reconsideration Pursuant to SCRCP
59(e) of the Order of the Court Dated November 20, 2007
Allowing Combining of Funds
- 145 12/3/07 Petitioner Tommie Rae Brown's Motion to Review Document
under Seal w/COS
- 145a 12/3/07 South Carolina Attorney General Henry D McMaster's Response
in Opposition to Motion for Summary Judgment Filed by Tommie
Rae Brown
- 146 12/4/07 Attorney General Thurbert E Baker's Response to Petition for
Accounting w/COS
- 147 12/4/07 Attorney General Thurbert E Baker's Response to Amendment
and Supplement to Motion to Declare James Brown Enterprises,
Inc and Asset of the Estate w/COS
- 148 12/4/07 Attorney General Thurbert E Baker's Response to Motion and

- Recommendation of Special Administrators w/COS
- 149 12/4/07 Return to Motion to Review Document under Seal w/COS 12/5/07
(Pope and Buchanan)
- 150 12/5/07 Answer of the South Carolina Attorney General w/COS
- 151 12/5/07 Response of the South Carolina Attorney General to the
Amendment and Supplement to Motion to Declare James Brown
Enterprises, Inc an Asset of the Estate w/COS
- 152 12/5/07 Return to Review Document under Seal w/COS (Henry D
McMaster)
- 152a 12/12/07 Order Allowing the Review of David Cannon's Financial
Statement and Tax Returns to Certain Parties
- 153 12/13/07 Amendment and Supplement to Motion to Vacate Amend or
Reconsider Order w/COS
- 153a 12/14/07 Objection of the Office of the South Carolina Attorney General to
the Appointment of the Special Administrators as Personal
Representatives/Trustees
- 154 12/14/07 Affidavit of Adele J Pope w/Attachments
- 155 12/17/07 Affidavit of Robert L Buchanan, Jr
- 156 12/18/07 Withdrawal of Motion Related to Ownership of James Brown
Enterprises, Inc w/COS
- 157 12/19/07 Motion of Tommie Rae Brown to Review Documents w/COS and
Motion Coversheet
- 158 12/21/07 Attorney General Thurbert E Baker's Motion to Review
Documents w/COS
- 159 12/22/07 Alfred A Bradley's and Albert Dallas' First Request for
Production to Adele Pope and Robert Buchanan
W/COS
- 160 12/22/07 Alfred A Bradley and Albert Dallas's First Interrogatories to
Adele Pope and Robert Buchanan, Jr
- 161 12/28/07 Return by Children and Grandchildren of James Brown to Motion
to Vacate, Alter or Amend November 20, 2007 Order
- 162 1/4/08 Return and Opposition All Motion to Vacate, Amend or
Reconsider the Order of the Honorable Doyet A Early, III, Dated
November 20, 2007
- 163 1/3/08 Petition to Vacate Order Granting the Motion to Intervene on
Behalf of the Georgia Attorney General Thurbert E Baker and
Petition to Vacate the Order Granting Permission for the Georgia
Attorney General to Appear Pro Hac Vice
- 164 1/6/08 Affidavit of Adele J Pope
- 165 1/6/08 Affidavit of Darren Julien
- 166 1/7/08 Notice of Appearance of Wayne Byrd
- 167 1/7/08 Affidavit of Robert L Buchanan, Jr
- 168 1/7/08 Supplemental Affidavit of Adele J Pope

- 169 1/7/08 Motion to Relieve Stanley G Jackson, Esq As Counsel for Albert Dallas and Alfred A Bradley and in Lieu Thereof Substitute as Counsel R Wayne Byrd
- 170 1/7/08 Supplemental Return to Motions Related to Order Removing Personal Representatives and Trustees and Appointing Successors, and Motion for Hearing and Findings Related to the Appointment and Service of Personal Representatives and Trustees
- 171 1/8/08 Order Directing Payment of Fees and Costs of Special Administrators and Other Relief
- 172 1/8/08 Motion for Continuance
- 173 1/8/08 Repudiation of Oral Resignation as Trustees
- 174 1/10/08 Notice of Taking Videotaped Depositions
- 175 1/15/08 Return to All Motions to Disqualify Counsel and Motions for Attorney's Fees and Sanctions
- 176 1/15/08 Response of Forlando Brown to Affidavit of Adele J Pope
- 177 1/24/08 Order (Denying Cannon's Motion to Stay Contempt Sentence)
- 178 1/24/08 Petition for Expenses Incurred at the Jan 9 2008 Hearing
- 179 1/28/08 Return to Louis Levenson's Petition for Expenses Incurred at the January 9, 2008 Hearing
- 180 1/28/08 Second Amendment and Supplement to Motion to Vacate Amend or Reconsider Order
- 181 1/30/08 Affidavit of Alfred A Bradley
- 182 1/30/08 Affidavit of Alfred A Bradley
- 183 1/30/08 Affidavit of Albert H Dallas
- 184 1/31/08 Notice of Change of Counsel
- 185 2/15/08 Return and Opposition of Personal Representatives and Trustees to Second Amendment and Supplement to Motion to Vacate Amend or Reconsider Order
- 186 2/15/08 Affidavit of Audra M Byrd
- 187 2/18/08 Affidavit of Adele J Pope
- 188 2/18/08 Affidavit of Robert L Buchanan
- 189 2/29/08 Return and Opposition of Personal Representatives and Trustees to Motion to Be Relieved as Counsel for Appellant and for Extension of Time in Which to File Initial Brief
- 190 3/04/08 Affidavit of Rita B Cullum
- 191 3/07/08 Order Denying Motion to Alter, Amend or Vacate Order Approving Resignation and Granting Related Relief
- 192 3/13/08 Notice of Motion and Motion for Relief from Order Dated August 10, 2007, Pursuant to Rule 60 SCRPC
- 193 3/20/08 Amended Return to Motion for Relief from Order Dated August 10, 2007
- 194 4/08/08 Order of Protection
- 195 4/08/08 Order Denying Motion to Reconsider Appointment of Successor

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- 195a 4/10/08 Personal Representatives and Trustees and Granting Related Relief
Response to Forlando Brown, Romunzo Brown and Terry Brown's
First Set of Interrogatories by the above Listed Lawful Heirs of
James Brown
- 196 4/21/08 Joint Affidavit of Robert L Buchanan, Jr and Adele J Pope
Opposing Motion for Relief from August 10, 2007 Order
- 197 4/22/08 Affidavit Stanley G Jackson, Esq
- 198 4/23/08 Motion to Strike the Motion and the Amended Motion for
Contempt as to Buddy Dallas and Al Bradley
- 199 4/24/08 South Carolina Attorney General's Motion to Alter or Amend
Judgment and/or for Reconsideration Pursuant to SCRCP 59(e)
- 200 4/24/08 Objections of William F Hammond Hull Towell, Norman Barrett
and Salley PC to Subpoena
- 201 4/28/08 Plaintiffs' Motion for Issuance of Commission to Take a
Deposition Out-of-state (Frank S McGaughey, III, Esq)
- 202 4/28/08 Plaintiffs' Motion for Issuance of Commission to Take a
Deposition Out-of-state (William B Shearer, Jr , Esq)
- 203 4/28/08 Plaintiffs' Motion for Issuance of Commission to Take a
Deposition Out-of-state (Joel A Katz, Esq)
- 204 5/01/08 Affidavit of Carolyn Dehart
- 205 5/01/08 Affidavit of Adele J Pope (Removal/appointment/accounting)
- 206 5/05/08 Order on Issuance of Commission to Take a Deposition Out-of-
state (Joel A Katz, Esq)
- 207 5/28/08 Pr/trustees' Notice of Motion and Motion for Contempt and
Pr/trustees' Return to Motions of Other Interested Parties
Regarding Powell Goldstein Files
- 207a 9/25/08 Pr/trustees Response to Motion of South Carolina Attorney
General and Others for Stay of Responses And Discovery
- 208 Proposed Order
- 209 Proposed Supplemental Order
- 210 Proposed Order-plaintiffs' Motion to Compel Discovery
- 211 Proposed Amended Order - Plaintiff's Motion to Disqualify
Counsel for Carrington and Sydney L [REDACTED]
- 212 Proposed Stipulation
- 213 Proposed Confidentiality Agreement
- 214 Proposed Order of Commission
- 215 Proposed Consent Order of Guardian as Litem, Stephen Slotchiver
of the Minor James [REDACTED] B [REDACTED], for DNA Testing
- 216 Proposed Order

- 2 Manila folder entitled Dallas/Bradley Supersedes
- 3 Order relating to Morgan Stanley documents dated 5/18/08 NOTE Issued prior to
re-numbering of Case #872

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- 4 Red Rope Folder, Motion for Recusal Hearing January 4, 2008 Contains various affidavits, returns, etc Not made part of pleadings notebook

✓ **BOX 134- JB BUSINESS MATTERS, PERFORMANCE CONTRACTS, ETC**

Contains various pre-death matters including

- 1 Red Rope folder, JB Performance Contracts #1
- 2 Red Rope folder, JB Performance Contracts #2
- 3 Universal Movie Matter
- 4 Violet folder (from Dallas files) WAAW Barnwell Radio Station

KF **BOX 135 - LEON FRIEDMAN FILE #3**

Delivered directly to R. Bauknight by counsel in Morgan Stanley case Received from Leon Friedman on or about March 17, 2009 See shipping label on box Mr Bauknight to index [Also see boxes 92, 93, 136, 137, 138]

12F **BOX 136 - LEON FRIEDMAN FILE #4**

Delivered directly to R. Bauknight by counsel in Morgan Stanley case Received from Leon Friedman on or about March 17, 2009 See shipping label on box Mr Bauknight to index [Also see boxes 92, 93, 135, 137, 138]

KF **BOX 137 - LEON FRIEDMAN FILE #5**

Delivered directly to R. Bauknight by counsel in Morgan Stanley case Received from Leon Friedman on or about March 17, 2009 See shipping label on box Mr Bauknight to index [Also see boxes 92, 93, 135, 136, 138]

KF **BOX 138 - LEON FRIEDMAN FILE #6**

Delivered directly to R. Bauknight by counsel in Morgan Stanley case Received from Leon Friedman on or about March 17, 2009 See shipping label on box Mr Bauknight to index [Also see boxes 92, 93, 135, 136, 137]

BOX 139- McMASTER VS DALLAS, Aiken County Case No 08-CP-02-1647

Miscellaneous duplicates from file of , including motions, Numbered Exhibits, Affidavits, etc, including some of following [Please call if you do not have a copy of what you need]

- 1 9/28/08 Petition for Removal and Restraint of Trustees
- 2 9/28/08 Motion for Removal to Circuit Court
- 3 9/29/08 Certificate of Exemption from Adr
- 4 10/17/08 David G Cannon's Response to Petition for Removal and Restraint of Trustees and Response to Motion to Remove to Circuit Court W/cos
- 5 10/24/08 Motion to Intervene and Dismiss (Buchanan and Pope)
- 6 11/7/08 Summons and Amended Petition for Removal and Restraint of Trustees

- Albert H Dallas, Alfred A Bradley and David Cannon and Removal and Restraint of Personal Representatives and Trustees Adele J Pope and Robert L Buchanan, Jr
- 7 11/7/08 Motion for Removal to Circuit Court
 - 8 11/7/08 Response in Opposition to Motion to Intervene and Dismiss (Plaintiffs)
 - 9 11/7/08 Motion for Emergency Appointment of Special Administrator and Special Trustee (Plaintiffs)
 - 10 11/7/08 McMaster Order (Removal)
 - 11 11/17/08 Objection to Subpoena, Notice of Motion & Motion to Quash and Motion for Protective Order (Cannon)
 - 12 11/17/08 Acceptance of Services and Certificates of Service
(File Date) Showing Service, Filed on 11/17/08, on the Following Adele J Pope, Robert L Buchanan, Jr, James M Griffin, William J Barr, Jan L Warner
 - 13 11/21/08 Answer to the Amended Petition, Counterclaim, Cross Claim, Return to Petitioner's Emergency Motion (Buchanan and Pope)
 - 14 11/24/08 Memorandum in Support of David G Cannon's Request for Recusal the Honorable Doyet A Early, III W/attachments
 - 15 11/24/08 Motion to Implead the Attorney General for the State of Georgia and to Restrain the Attorney General of the State of South Carolina from Taking Any Action Inconsistent with His Constitutional Duties to Protect the Charitable Beneficiaries of the James Brown Trusts (Cannon)
 - 16 11/24/08 Joint Affidavit of Robert L Buchanan, Jr and Adele J Pope Supporting Demand for Due Process Hearing and Related Relief
 - 17 11/24/08 Affidavit of David G Cannon in Support of Motion to Recuse Doyet A Early
 - 18 11/25/08 Motion to Recuse the Honorable Doyet A Early, III (Cannon)
 - 19 11/25/08 Motion to Dismiss Tommie Rae Hynie as a Party to this Action (Cannon)
 - 20 12/9/08 Supplemental Return and Objection to Appointment Etc W/cos (Buchanan and Pope)
 - 21 12/19/08 Notice of Motion and Motion to Dismiss (Dallas and Bradley)
 - 22 12/22/08 Answer to the Amended Petition and Responsive Pleadings of Terry Brown and Romunzo Brown
 - 23 1/7/09 Order (Appointing Special Trustee)
 - 24 1/9/09 Motion to Realign, for Partial Summary Judgment and for Mediation after Proper Joinder of Parties and Discovery
 - 25 1/14/09 Motion to Alter or Amend Judgment (Buchanan and Pope)
 - 26 1/16/09 Motion for Approval of Settlement Agreement
 - 27 1/20/09 Joint Affidavit of Robert L Buchanan, Jr and Adele J Pope
 - 28 1/20/09 Motion for Partial Summary Judgment (Buchanan and Pope)
 - 29 1/20/09 Motion to Reconsider, Vacate, Set Aside, Alter And/or Amend or Clarify Order Appointing Russell Bauknight as Special Trustee Dated January 9, 2009, a Copy of Which Was Received by Counsel for David G Cannon

- 30 1/21/09 on January 9, 2009 and Motion to Stay Pursuant to Scrap 2005
Response, Partial Agreement and Partial Objection to the Brief in
Opposition to Settlement with Cos (Buchanan and Pope)
- 31 Due Diligence Issues Related to Motion to Approve Settlement
- 32 1/28/09 Appearance of Jacque Hollander W/affidavits and Petition to Intervene
- 33 1/29/09 Brief in Opposition to Motion of Recusal
- 34 1/29/09 Return to Motions for Recusal and Motion for Sanctions and for
Attorney's Fees W/cos for 33 and 34
- 35 1/29/09 Response of Terry Brown and Romunzo Brown to Motion to Realign, et
Al W/cos
- 36 1/29/09 Special Appearance by Matt Bodman on Behalf of Forlando Brown to
Motion to Realign, et Al W/cos
- 35 2/5/09 Return of Defendants Buchanan and Pope to Motion for Approval of
Settlement and Proposed Amendment Presented January 30, 2009 and
Notice of Dissent and Motion for Proper Joinder and Court-ordered
Mediation and Return and Reply to Response of Terry and Romunzo
Brown and "Special Appearance" of Forlando Brown W/cos
- 36 2/17/09 Return an Opposition to Motion and Motion for Attorneys' Fees, Costs,
Bond and Injunction of Pr/trustees
- 37 2/23/09 Affidavit of Adele J Pope Opposing Removal of Pr/trustees Buchanan &
Pope W/cos for 37 and 38
- 37 2/17/09 Affidavit of Robert L Buchanan, Jr and Adele J Pope in Support of
Injunction and Damages for Intentional Interference
- 38 2/5/09 Joint Affidavit of Robert L Buchanan, Jr and Adele J Pope W/cos for
32, 33 and 34
- 39 2/19/09 Plan of Transition (Bullet Points) W/cos
- 40 2/23/09 Motion and Memorandum Dated February 23, 2009
- 41 2/23/09 Affidavit of Adele J Pope Opposing Removal, f Pr/trustees W/cos, 36
& 37
- 42 3/2/09 Response and Objection to Agenda and Hearing Based on Matters Being
Moot and Other Related Relief W/cos Dtd 3/3/09
- 43 3/3/09 Return and Opposition of Pr/trustees Buchanan and Pope to Motion to
Strike and All Other Motions W/cos
- 44 3/12/09 Motion to Reconsider, Vacate, Set Aside, Alter And/or Amend And/or
Clarify Orders W/cos
- 45 3/17/09 Supplemental Motion of Pr/trustees to Dismiss (Where Applicable), and
for Partial Summary Judgment W/cos
- 46 4/1/09 Offer of Compromise W/cos
- 47 4/2/09 Joint Affidavit of Robert L Buchanan, Jr and Adele J Pope

**BOX 140- MISC FILES CONFIDENTIAL WORK PRODUCT, RESEARCH FILES,
BROWN ADMINISTRATION PRIVILEGED, BAILEY PRIVILEGE, FEW/GILREATH**

PRIVILEGE,

confidential

NOTE In front of first privileged folder is confidential Order for PR only

Subfiles include

Research - Pullman Bonds

Research - Copyrights

Administration - Privileged Hogan and Hartson

Administration - Privileged James Bailey

Administration - Privileged Few/Gilreath

Administration - Privileged Cannon Matters

Administration - Privileged Corbis Litigation

Administration - Privileged New York Litigation

Administration - Privileged Fee Agreement, New York Litigation

Brown 7th Decade Notes and Copies

Other 7th Decade files

Brown/Dallas Appeal Work Product

BOX 141- FILE OF WILLIAM HAMMOND

Contains Original File of William Hammond 8313-01, including various subfiles

Universal royalty Statements for Period ending December 31, 2006

Dynatone, Etc File for Period ending December, 2006

BOX 142 - DECLARATORY JUDGMENT CASE NO 2007-CP-02-0122, ELECTIVE SHARE MATTERS,DALLAS FILES JAMES BROWN V TOMI RAE HYNIE BROWN, DOLL PROJECT, JAMES BROWN CONSENT DECREE, MISCELLANEOUS MATTERS

Notebook - Documents filed by Levenson on 6/17/08 in connection with Motion to Revoke David Bell's Pro Hac Vice Status

Folder Elective Share - Velma Brown

File Entitled Greenberg Traurig - containing collection of unsorted bills, correspondence, etc related to GT

Folder - James Brown Communications, Inc

Folder - American Dream

Brown Family Children's Foundation - with correspondence from Louis Levenson dtd May 2, 2007

Also contains 2 violet folders, both formerly from Dallas Box 9, with pleadings and other information about the annulment proceeding brought by James Brown against Tomi Rae Hynie Brown in 2003, including

1 Consent Order of the Honorable Doyet A Early, III dtd March 15, 2007 in Case 122

unsealing case file C/A No 04-DR-02-157 and directing that it be resealed once certified copies are obtained [Executed on behalf of the Estate by A Camden Lewis & Rodney Peebles]

2 Pleadings and Correspondence from Aiken County Family Court Case No 2004-DR-02-157, JAMES JOE BROWN, JR , Plaintiff vs TOMMIE RAE HYNIE AHMED BROWN, Defendant, including

January 29, 2004 Notice of Motion and Motion by James Huff and Albert H Dallas, Attorneys for Plaintiff, that Plaintiff will move on April 20, 2004 at 3 00 p m , or for the relief requested in the complaint

Summons and Complaint for Annulment filed January 29, 2004

Amended Summons and Amended Complaint for Annulment dated May 5, 2004 and filed May 6, 2004, with attachments

Copy of Summons and Complaint, TOMMIE RAE HYNIE a/k/a TOMMIE RAE BROWN vs JAVED AHMED, charleston County Family Court Case No 03-DR-10-4609

Notice of Appearance of Donald B Clark, charleston, as additional counsel for Tommie Ray [sic] Hynie Brown dtd May 25, 2004, filed June 1, 2004, Aiken Case

Ltr of Donald B Clark, Donald B Clark, LLC, to Liz Godard dated May 25, 2004 filing Notice of Appearance

Acceptance of Service by Robert Rosen for Defendant, dtd May 14, 2004, filed June 7, 2004

Notice of Motion and Motion and Motion for Temporary Relief of Hynie Brown dated June 3, 2004 Hearing date July 22, 2004 seeking exclusive use and possession of her residence located at 218 Crystal Springs Road, Graniteville, SC, and contents, restraining Plaintiff from exercising any contractual options or enforcing any contractual agreements involving his businesses, including but not limited to James Brown entertainment and other restraint, and for discovery

Ltr of Marcia F Jones, Paralegal to Robert Rosen dtd June 3, 2004 filing same,

Answer and Counterclaim of Tommie Rae Hynie Brown dated June, 2004, filed June 14, 2004 seeking various relief (Aiken County Family Court, including

Reply of James Brown to counterclaim, dtd July 3, 2004 , file July 6 with COS dtd July 6

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Notice of Motion and Motion of Hynie Brown for Live Testimony dtd July 12, 2004,
filed July 14, 2004, with affirmation

Request of Jim Huff for final hearing dtd June 17, 2004 and letter requesting same

Ltr from Tim Purtell Entertainment Weekly enclose check for \$2 to cover cost of faxing
annulment papers

Fax from Mr Huff to Mr Rosen dtd 7/21/04 containing Brown Order & Motion
Consent Order of dismissal dated and filed August 16, 2004 May 6, 2004

Notice of Motion ad Motion for sealing of Order dtd July 21, 2004

ltr From Jane E Jones, Sect to James B Huff to Mr Rosen dtd August 24, 2004 sending
certified copy of consent Order in case

Research and post-death notes of Peeples

Ltr of James B Huff to James Brown dtd March 17, 2004 re annulment

Certificate of Pardon, newspaper clippings

Ltr from R Rosen to James Huff dtd 2/23/04 re Rule 4 2, non-communication with his
client, and forthcoming civil action to be filed against Mr Brown and others for \$5,000,000 00
in Ct Of Common Pleas

**ROBERT L. BUCHANAN, JR AND OTHER, PLAINTIFFS VS THOMAS AND OTHERS,
DEFENDANT**

Pleadings Index including

- 1 11/27/07 Summons and Complaint of Declaratory Judgment and Related Relief
Including Expedited Emergency Relief
- 2 11/29/07 Affidavit of Service and Proof of Delivery
- 3 11/29/07 Acknowledgment of Service to Tommie Raye Hynie Brown or Her
Counsel
- 4 Acknowledgment of Service to Counsel for Terry Brown, Romunzo
Brown and Forlando Brown
- 5 11/29/07 Acknowledgment of Service to A Peter Shahid, Jr
- 6 Acknowledgment of Service to Louis Levenson
- 7 12/13/07 Emergency Motion for Stay of "Declaratory Judgment and Related

- Relief" Proceedings W/exhibits
- 8 12/20/07 Response of Defendants Romunzo Brown, Forlando Brown and Terry Brown to Complaint for Declaratory Judgment and Relief
 - 9 12/26/07 Response of Defendants to Complaint of Adele J Pope and Robert L Buchanan for Declaratory Judgment W/cos
 - 10 12/28/07 Response by Attorney General Henry Dargan McMast to the Complaint for Declaratory Judgment and Related Relief Including Expedited Emergency Relief W/cos
 - 11 1/19/08 Answer of the Defendant James B [REDACTED], a Minor by Stephen Slotchiver, His Guardian Ad Litem to the Complaint for Declaratory Judgment and Related Relief Including Expedited Emergency Relief of the Named Plaintiffs
 - 12 1/23/08 Trial Brief (Complaint for Declaratory Judgment and Related Relief, Including Expedited and Emergency Relief
 - 13 2/5/08 Response of Forlando Brown, Terry Brown and Romunzo Brown to Trial Brief Filed by and on Behalf of Adele Pope and Robert Buchanan with Cos
 - 14 2/18/08 Response of Forlando Brown, Terry Brown and Romunzo Brown to Adele Pope and Robert Buchanan's Plan and Proposal to Dispose of Trust Assets with Cos
 - 15 2/20/08 Order of the Honorable Doyet A Early In Approving Sale of Tangible Personal Property and Real Estate and Granting Related Relief (Filed on 2/23/08)
 - 16 2/28/08 Plaintiffs' Return and Opposition to Motion of Terry Brown, Forlando Brown, and Romunzo Brown W/ Cos
 - 17 3/12/08 Objection to Christie's Plan for Sale/auction
 - 18 3/21/08 Notice of Selection for Sale Pursuant to Final Order Approving Sale of Tangible Personal Property W/cos
 - 19 3/27/08 Motion for Extension of Time to Review and Analyze Items on Christie's Sale Selection List
 - 20 4/1/08 Supplemental Order Directing Execution of Contract and Sale
 - 21 5/1/08 Affidavit of F Hamilton Kuhlke
 - 22 5/2/08 Motion for Emergency Determination of Ownership and Charging of All Costs of Withdrawal, Hearing and Due Diligence and Related Relief
 - 23 8/8/08 Petition to Distribute Remaining Tangible Personal Property
 - 24 8/14/08 Pr/trustees' Return to Petition to Distribute Remaining Tangible Personal Property
 - 25 8/18/08 Return to Post-judgment Motion for Costs Related to Interference with Sale
 - 26 8/18/08 Response to Petition to Distribute Remaining Tangible Personal Property

BOX 143 - FORLANDO BROWN FEDERAL SUIT, CONFIDENTIALITY AGREEMENTS, WELLS NOTEBOOK

Contains documents copied in Forlando Brown Federal Suit by others

Privileged documents

Brown signed and proposed Confidentiality Agreements [Counsel in CORBIS, MORGAN STANLEY, and FORLANDO BROWN suit will have signed copy]

Another Large Black notebook, with letter from Tom Wells to Albert H Dallas and Alfred A Bradley dated November 13, 2007

BOX 144 - FORLANDO BROWN FEDERAL SUIT TO ENJOIN TRUST (Also See Notes to Box 114)

These are copies produced from Reading Room Number 1 - 2611

NOTE Subject to Confidentiality Order in this Case See File

Please return this Box after scanning

BOX 145 - BOX OF DOCUMENTS RETURNED BY DAVID G CANNON

This is a box of documents returned to the home, we were told, by Mr Cannon It contains personal photos, a rolodex, a plastic case containing 35 large and 2 small 3M style disks, a box containing 12 Verbatim disks, an envelope of negatives from Tim Conway Photography, a 20unt Turkish bill, a James Brown signature stamp, a stamp, 2 photos groups in rubber band, 2 sony small cassettes, August '99 and Europe '99, a handwritten letter from a Toccoa High School student, 2 Jet Magazines, may 30, 2005 and Jan 22, 2007, James Brown's black Wallet, with several cards, including S C Driver's License and various other cards, 5 half-size manila envelopes of pictures marked as follows Adrienne Funeral, Old JB Office, Comcast 2000 48 (containing only 45) , Misc Brown 16 (containing 17) , X-Mas 2000 25 NOTE Number does not correspond to number of pics in envelope SunTrust checkbook (1) and blank register, PET CD, 24 CDs as follows

- 1, CD focus House JB
- 2 Aug Tech Lodge, etc
- 3 Gent Store, JB Turkey, Kim's Big Day, etc
- 4 AB Sports 2003
- 5 James Brown Turkey Give Away 2004
- 6 JB Statue University
- 7 Mojo Interview 2004
- 8 Godfather Pics, Misc
- 9 James Brown X-Mas Toys 2002
- 10 James Brown X-mas Party 2002
- 11 James Brown turkey Give Away 2002
- 12 James Brown X-mas 2004
- 13 James Brown give Away 2005
- 14 James Brown give Away 2005
- 15 James Brown Festival 2006

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16 James Brown bike Race
17 James Brown Wedding
18 James Brown X-Mas 2003
19 James Brown Video 2003
20 James Brown Video 2003
21 James Brown Day 2003
22 Godfather Homecoming 1st Set
23 Godfather Homecoming 2d Set
24 Godfather Printed JB Brochure JB Festival 2006
25 JB Cycles, JB Hot, JB Show, etc
26 James Brown in Greenville
27 James Brown & Hakim
Plastic bag containing numerous keys
Silver Album with Wedding Photos

NOTE These were preserved as returned

TRANSFERRED FROM

Adele J. Pope Robert J. Buchanan, Jr.
ROBERT M BUCHANAN, JR OR
ADELE J POPE

RECEIVED BY:

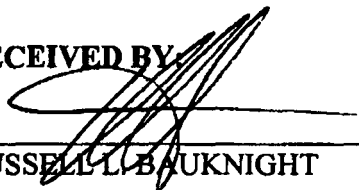

RUSSELL L. BAUKNIGHT

EXHIBIT A

**Index to Boxes
Provided to Adele Pope**

07-116

<i>Name of Box Label (L&B)</i>	<i>Box Labeled</i>	<i>General Contents</i>	<i>Date provided to Adele Pope</i>
7th Decade Box Number One	7th D Intrigue Music Invoices	Invoices 7th Decade to Intrigue Music 2004, 2005, 2006	8/13/07 9 30 a.m
7th Decade Box Number Two	7th D Contracts 2005	Check Stubs Payments in Folders 2006 1099 Enterprise Bank 2005/2006 Account Reconciliation 2006 Band Payroll Enterprise Bank Statements for 2006 William Morris to Frank Copsidas 2006 Buyer issued Contracts and Artist Riders Invoices from 7th Decade to Intrigue Music 2006	8/13/07 9 30 a.m
Box Number Three JBE, Inc. Regular & Payroll	Not Labeled	Blank Checks JBE, Inc 8239 - Check Number 008239-053201814 39 300 1562 JBE, Inc Payroll 7994 - Check Number 007994 253271819 3933001849	8/13/07 9 30 a m

L&B Box Number ONE	None	Documents Selected by Louis Levenson on 7/17/07 and produced on 7/23/07 Bates 2475 - 4088 1999 Tax Documents 1998 Tax Documents Tax Deposits	8/13/07 3 30 p m
L&B Box Number TWO	JBE 1998 & 1999	Documents Selected by Louis Levenson on 7/17/07 and produced on 7/23/07 Bates 4089-13361 Examples of File Folders AT&T AR James Brown State of California Warren Chappell United Parcel 1998 JBE Payroll Polygram Royalty	8/13/07 3 30 p m

L&B Box Number THREE	James Brown Enterprises (2002 & Before) (Box 1 of 2) (A-U) BOX 1 OF 2	Documents Selected by Louis Levenson on 7/17/07 and produced on 7/23/07 Bates 13362-18309 In front of file are some blank Radio Station Checks and other radio station related items File Folders - Examples James Brown Personal Copies of numerous cashiers checks to James Brown in \$9,000 00 increments File Folders by Vendors - Examples. Garbage Service Smith Barney Delta Life & Annuity AT&T BMG General Ledger - 2002- contains numerous copies of cashier's checks including some in 2000 House of Blues - Includes Common Stock Monthly Checks Folder - Includes copies of Cashiers checks	8/13/07 3 30 p m
Morgan Stanley L&B Box Four		Feb 1999 to Jan 2000 and undated MS Statements	8/14/07 11.00 a m
Morgan Stanley L&B Box Five		January 2000 to March 2001 and Undated	8/14/07 11.00 a m
Morgan Stanley L&B Box Six		May 2002 to September 2003 and undated	8/14/07 11.00 a m
Morgan Stanley L&B Box Seven		July 2003 - June 2004 & Undated	8/14/07 1 30 p m
Morgan Stanley L&B Box Eight		Feb 2001 - Jan 2002 & Undated	8/14/07 1:30 p m
Morgan Stanley L&B Box Nine		Jan 2002 - Aug 2002 & Undated	8/14/07 1 30 p m

M&T L&B Box Number Ten	M&T Universal Rhino Royalty Statements - 1005	M&T 1/03, 9/03, 10/03, 5/04, 7/04, 2/05, 3/05, 6/05 Warner Chappell 7 thru 9, 2002 2/03, 5/03, 4/05, 6/05 Rhino Home Video 9/04, 8/05, 11/05 Universal 3/05, 6/05 BMI 1/05	8/14/07 1.30 p m
M&T L&B Box Number Eleven	Intrigue Music Reports 2002-2004 M&T Investment 2003-2004	Intrigue to 7th Decade 12/02 2/03, 3/03, 5/03, 6/03, 8/03, 11/03 1/04, 2/04, 3/04, 5/04, 6/04, 7/04, 9/04	8/14/07 1:30 p m

JUN 29 2009

M&T L&B Box Number Twelve	M&T Universal W/C Rhino Royalty Statements 2005	BMI 8/05 Warner Chappell 10/01 Deanna & JB Warner Chappell 12/99, 4/00 to 6/00 Jadar July to Sept. 2001 File - Bobby Byrd File - Carlin American File - Home Builder Receipts John Seaton - File MGM Brown Envelope Jadar Jan - March, 2002 April - June 2002 10/12/04 Jan - March, 2005 April - June, 2005 September 2005 October to Dec. 2005 Universal Attractions - Royalty Statements 6/30/02, 6/30/03, 12/31/03, 6/30/04, 12/31/04	8/14/07 2 30 p m
M&T L&B Box Number Twelve (Continued)		M&T Statements Oct thru Dec, 2003 Jan thru Dec, 2004 Jan thru Dec, 2005	8/14/07 2 30 p m

M&T L&B Box NumberThirteen	M&T	The Pullman Group Music Royalties IV Closing Dates 6/4/99 & 6/11/99 - Partial Copy Dynatone Statement 1/3/06 April to June, 2006 July, 2006 BMI Royalty Statement 1/07, 2/07 M&T Statements July 2002 November 2002 Jan to Dec, 2006 Jan to May 2007 Universal Statements 6/06 12/06	8/14/07 2:30 p m
WAAW Radio Station L&B Box NumberFourteen	WAAW	WAAW Annual 1999 GL 2000 & 2001 Bk Statements 2001	8/15/07 9 15 a m
WAAW Radio Station L&B Box Number Fifteen	WAAW	2002 BK Statements Vendor File Folders 2001 Materials 1996, 1998 Misc	8/15/07 9.15 a m
JBE 1996/1997 L&B Box Number Sixteen	None	JBE General Ledger 1996/1997 1997 BK Statements	8/15/07 9 15 a.m

Bank Statements 1999 L&B Box Number Seventeen	None - Pulled from various boxes to create uniformity for discovery purposes	Regions Bank James Brown Enterprises, Inc. 39-0392-1441 August 31, 1999 October 29, 1999 Regions Bank James Brown Enterprises, Inc Payroll Account 39-3300-1849 Jan thru Dec 1999 Georgia Bank & Trust Co James Brown Enterprises Escrow Account 1016857 Jan - Dec 1999 - Missing August 1999 Regions bank James Brown Building Account 39-0392-1328 June thru Dec 1999 Regions Bank James Brown Enterprises 39-3300-1562 Jan thru Dec 1999 Georgia Bank & Trust Company James Brown Enterprises 1016865 Feb to Dec 1999 Regions Bank James Brown 39-3003-9191 9/99 thru 12/99 Pre-1999 - Not Indexed	8/16/07 10 00 a m
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Bank Statements 1999 L&B Box Number Seventeen	None - Pulled from various boxes to create uniformity for discovery purposes	Regions Bank James Brown Enterprises, Inc 39-0392-1441 August 31, 1999 October 29, 1999 Regions Bank James Brown Enterprises, Inc Payroll Account 39-3300-1849 Jan thru Dec 1999 Georgia Bank & Trust Co James Brown Enterprises Escrow Account 1016857 Jan - Dec 1999 - Missing August 1999 Regions bank James Brown Building Account 39-0392-1328 June thru Dec 1999 Regions Bank James Brown Enterprises 39-3300-1562 Jan thru Dec 1999 Georgia Bank & Trust Company James Brown Enterprises 1016865 Feb to Dec 1999 Regions Bank James Brown 39-3003-9191 9/99 thru 12/99 Pre-1999 - Not Indexed	8/16/07 10 00 a.m.
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Bank Statements 2000 L&B Box Number Eighteen BOX 1 of 2	None - Pulled from various boxes to create uniformity for discovery purposes	Bank of America James Brown 0001 7006 0800 June thru Sept 2000 Sept thru Dec 2000 Bank of America James Brown Home Building Fund 0007 0119 0785 12/23/99 thru 3/26/01 (Statements are for periods of time that overlap years - unable to segregate) First Federal Bank James Brown c/o The New James Brown Enterprises 40031132764 Jan 2000 Missing Feb and March April thru Dec 2000 Barclays Mr. James Joseph Brown 20330027 Jan 15 to April 14 2000 Regions James Brown Household Account 39-3004-2337 Jan 2000 May 2000 June 2000 First Union National Bank James Brown 10800015451548 4/22/00 to 5/23/00 Washington Mutual Bank James Brown Foundation 871-859810-1 Jan & April thru Dec 2000 Missing Feb & March 2000	8/16/07 10 00 a.m
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JUN 29 2009

Box Eighteen continued		Washington Mutual Bank Deanna and Yamma Trust 871-1182098-9 5/25/00 thru 8/24/00 Bank of America Estate - Joseph Brown 0007 2802 7164 8/01/00 thru 8/31/00 Bank of America James Brown 00333-41590 Jan April thru Dec. 2000 Missing Feb & March 2000 Bank of America James Brown 0001 7006 0800 6/8/00 to 9/6/00 9/7/00 to 12/05/00 First Federal Bank James Brown c/o The New James Brown 40031132764 Jan thru Dec 2000 Georgia Bank & Trust co James Brown Enterprises Escrow Account 1016857 5/31/00 9/30/00 Wachovia James Brown Enterprises Endorsement Account 12 705 224 Jan April thru Dec 2000 Missing Feb. & March 2000	8/16/07 10 00 a.m
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JUN 23 2014

Box Eighteen Continued		Regions Bank James Brown Enterprises, Inc 39-3300-1562 Jan thru Dec. 2000 Regions Bank James Brown Enterprises, Inc. Payroll 39-3300-1849 Jan Thru Dec. 2000	8/16/07 10 00 a m
Bank Statements 2000 L&B Box Number Eighteen BOX 2 of 2	None - Pulled from various boxes to create uniformity for discovery purposes	Regions The New James Brown Enterprises, Inc Libby Account 39-0393-7488 Aug thru Dec 2000 Georgia Bank & Trust Co James Brown Enterprises Libby account 1016865 Jan thru Dec. 2000 Regions Bank James Brown 39-3003-9191 1/00 thru 7/00 Missing 8/02 9/00 thru 12/00 SouthTrust Bank Irrevocable Trust of James Brown 024-5257230-56881 11/16/00	8/16/07 10 00 a m

Bank Statements 2001 L&B Box Number Nineteen	None - Pulled from various boxes to create uniformity for discovery purposes	Bank of America James Brown 00333-41590 Jan thru May, 2001 and July 2001 Bank of America James Brown Home Building Fund 0007 0119 0785 Jan thru March 2001 June and July 2001 Bank of America James Brown 00330-23007 Jan thru June, 2001 First Federal Bank James Brown c/o the New James Brown Enterprises 40031132764 January 2001 First Union National Bank James Brown 1080001551548 March, 2001	8/16/07 10.00 a.m
Bank Statements 2001 L&B Box Number Nineteen (Continued)		Southtrust Bank Irrevocable Trust of James Brown 024-5257230-56881 January 2001 Wachovia James Brown Enterprises Endorsement Account 12-705-224 Jan thru July 2001 Regions Bank James Brown Enterprises, Inc Payroll 39-3300-1849 Jan thru Dec. 2001	8/16/07 10 00 a m

Box Nineteen Continued	Regions Bank James Brown Enterprises 339-3300-1562 Jan thru Dec 2001 Regions James Brown Enterprises, Inc 39-0393-7488 Jan thru March, 2001 Missing April 2001 May thru Dec 2001 Wachovia Estate of Adrienne Brown 12-705-521 Jan Thru April 2001 James Brown Irrevocable Trust Enterprise Bank 211100029 9/13/02, 10/12/02, 11/31/01, 12/13/01 Regions Bank James Brown 39-3003-9191 1/12/01	8/16/07 10 00 a m
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Bank Statements 2002 L&B Box Number Twenty	None - Pulled from various boxes to create uniformity for discovery purposes	Regions Bank The New James Brown Enterprises, Inc 39-0393-7488 Jan. thru Dec. 2002 Regions Bank James Brown Enterprises, Inc. 39-3300-1562 Jan thru Dec. 2002 Regions Bank James Brown Enterprises, Inc Payroll 39-3300-1849 Jan thru Nov 2002 Missing Dec. 2002 Regions Bank James Brown or Jewel Libby Child Care Expense 680-52-90-538 April, May, June 2002 James Brown Irrevocable Trust Enterprise Bank 211100029 1/11/02, 11/13/02 Regions Bank James Brown 39-3003-9191 1/02 thru 7/02 Missing 8/02 9/02 thru 12/02	8/16/07 10:00 a m
Bank Statements 2003 L&B Box Number Twenty-One	None - Pulled from various boxes to create uniformity for discovery purposes	Regions Bank James Brown or Jewel Libby Child Care Expense 680-52-90-538 Jan , March 2003 Regions Bank The New James Brown Enterprises, Inc 03-0393-7488 Jan thru Dec. 2003	8/16/07 10 00 a m

L&B Box Number Twenty-Two	JBE - 2000	Minus BK Statements Removed & Ms Libby, if any Example File Folders James Brown Enterprises, Inc. Account Reconciliation Payroll account As of December 31, 2001 Checks paid to: David Washington Ella Mae Overton Alex S Mayes, Jr Frieda K. Carter Jewel L. Libby Maria L. Dooling Elif Hogan Files for Each Month of 2000 Payroll Register Other Files Federal Taxes SC Taxes GA Dept of Revenue SC Dept. of Revenue Accounting Backup - Ms Libby Regions Bank	8/16/07 9 30 a.m
L&B Box Number Twenty-Three	JBE 91-99	Minus BK Statements Removed & Ms Libby, if any 1999 Quarterly Tax Returns Other Misc. Prior to 1999	8/16/07 9 30 a m

L&B Box Number Twenty-Four	James Brown Enterprises (2002 & Before) (A-u) Box 2 of 2 Payroll Registers - Acct Rec	Minus BK Statements Removed & Ms Libby, if any File Folder: Voided checks - James Brown Enterprises, Inc. - Palmetto Federal - 2002 Folders for Account Reconciliation and Payroll for 2002	8/16/07 9 30 a.m
L&B Box Number Twenty-Five	JBE 2004, 2003, 2003- 2001	Minus BK Statements Removed & Ms Libby, if any JBE Acct Rec. 2004, 2003 " Payroll "" " CA Employment 2002 " 1099s Returned 2000 " GA - DOL 2003, 2002, 2001 " GA - DOR "" " 940's "" " 941's "" " IRS "" " SC - DOR "" " SC Empl. Security "" " W-2s returned 2001 " Acct. Rec. Libby 2003	8/16/07 9 30 a.m
L&B Box Number Twenty-Six Ms. Libby	2002 3/02 - 12/02	2002 3/02 - 12/02 Missing 11/02	8/16/07 12:30 p m

L&B Box Number Twenty-Seven Ms Libby	2001 and 2002 8/01 - 2/02	2001 and 2002 8/01 thru 2/02	8/16/07 12 30 p m
L&B Box Number Twenty-Eight Ms Libby	2001 1/01 - 7/01	1/01 to 7/01	8/16/07 12 30 p m
L&B Box Number Twenty-Nine Ms. Libby	2000 7/00 - 12/00	2000 7/00 to 12/00	8/16/07 12 30 p m
L&B Box Number Thirty Ms Libby	2000 1/00 to 8/00	2000 1/00 to 8/00	8/16/07 12.30 p m
L&B Box Number Thirty-One Ms. Libby	1998 - 1999	1999 7/99 to 12/99	8/16/07 12 30 p m
L&B (Bradley) Box Number Thirty-Two	Not Labeled Received 8/16/07	Examples of Folders SC Probation & Parole Warner & Chappell SC Secretary of State JBE Settlement Statements D Monk Promote Original Pay Per View Contract	8/21/07 9 30 a.m

L&B (Bradley) Box Number Thirty-Two	Not Labeled Received 8/16/07	Examples Black Notebook - JBE Irrevocable Trust - Minutes Black Notebook - 2002 contracts and on the road materials Folders. JB Doll HOB Stock, JBE General, Rhino Entertainment	8/21/07 9 30 a.m
Buddy Dallas Box One		Examples of File Folders. Robert Rosen Internet Problems Office Renovation Wrongful Death - A. Brown Geronimo Music Southtrust	8/20/07 5 00 p m
Buddy Dallas Box Two		Examples of File Folders Movie Deal Insurance Super Bowl EMI Contract Coca Cola	8/20/07 5-00 p.m
Buddy Dallas Box Three		Examples of File Folders Radio Station Litigation Aircraft Purchase Godfather of Soul Music	8/20/07 5 00 p m
Buddy Dallas Box Four		Examples of File Folders Radio Station Criminal Charge Mary Simmons Agreement Biography	8/20/07 5 00 p m
Buddy Dallas Box Five		Examples of File Folders WMLD Radio Station Files	8/20/07 5 00 p m.
Buddy Dallas Box Six		Examples of File Folders Station Settlement Brown v Spann	8/20/07 5 00 p m

Buddy Dallas Box Seven		Examples of File Folders JB File Polygram Misc Brown v Spann JBE, Inc. Deanna & Yamma	8/20/07 5 00 p.m
Buddy Dallas Box Eight		Examples of File Folders Brown v. Spann Welcome Home Concert GT - Billing Rocky IV	8/20/07 5.00 p m
Buddy Dallas Box Nine		Examples of File Folders DNA Global Gaming House Insurance I Feel Good Trust JB v Pullman Pardon Super Frank	8/20/07 5 00 p m
Buddy Dallas Box Ten		Examples of File Folders Top Talent lawsuit South Africa Project Criminal Charges Jet Plane Movie Deal	8/20/07 5 00 p m
Buddy Dallas Box Eleven		Examples of File Folders WMLD - Radio Brown v Spann	8/20/07 5 00 p m
L&B Box One 1-1324			8/24/07 9.30 a.m
L&B Box Two 1325-20260			8/24/07 9.30 a.m
L&B Box Three 20261-20735			8/24/07 9-30 a.m

Privileged Box containing Dewain Herring's file 18974-20167 and Other Privileged Documents (See Privilege Log of 8/24/07)			8/24/07 9 30 a.m
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JUL 22 2009

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN

PROBATE COURT

IN THE MATTER OF ESTATE OF JAMES BROWN
JAMES BROWN 2000 IRREVOCABLE TRUST

CASE NUMBER 2007-ES-02-0056

Decedent's Date of Death (if known) December 25, 2006
Decedent's Last Mailing Address 430 Douglas Drive
Beech Island, SC 29842

PROTECTIVE STATEMENT AND NOTICE OF CREDITOR'S CLAIM

Creditor Robert L Buchanan, Jr and Adele J Pope
Address c/o 212 Newberry Street
P O Box 463
Aiken, South Carolina 29802-0463
Telephone 803/649-2586

Basis of claim In accordance with Section 62-3-804(2)

Amount of claim

(a) Full PR/Trustees' commissions in the amount of \$4,993,151, with immediate deposit payment of \$2,153,983 plus interest at the legal rate from September 1, 2009, pursuant to Judgment dated January 8, 2008, in Case No 2007-CP-02-0122, together with all other relief sought in the Motion for Payment of Commissions and Related Relief and Joint Affidavit of Robert L Buchanan, Jr , and Adele J Pope Related to Commissions and Expenses dated June 24, 2009, supplemental Affidavit of Adele J Pope and Robert L Buchanan, Jr , Affidavit of Adele J Pope dated July 17, 2009, Complaint for Declaratory Judgment, Review of Compensation and Employment, Guidance as to Succession Plan, Approval of Accounting of PR/Trustees and for Order Granting Protection for Trustees upon Resignation dated May 22, 2009 and filed in this Court, which matters are now being heard in the Circuit Court for Aiken County in Case No 08-CP-02-1647, each of said referenced documents being incorporated herein by reference and made a part hereof as fully as if set out herein

(b) The relief requested herein, in addition to payment of PR/Trustees' commissions, with applicable interest, includes, but is not limited to, payment or reimbursement for all attorneys' fees incurred by Mr Buchanan and Ms Pope in connection with their service to the Estate of James Brown, the James Brown 2000 Irrevocable Trust and Brown Entities, including payment of all attorneys' fees and costs of the Forlando Brown Federal lawsuit referenced therein and all other relief requested therein

FORM #371PC (1/91)
62-3-804, 62-5-428

PAGE 1 OF 2

Filed 7-17-2009
Sup H. Roe
Judge of Probate
By *[Signature]*
2879

JUL 22 2009

(c) Reference to the said documents is craved for a more specific description and detail of the claim

Date claim will become due (if not already due) Commissions now due Other amounts due or to become due as stated

Nature of uncertainty as to amount of claim and due date, if any

Description of any security as to claim

Signature

Date

Signature

Date

INSTRUCTIONS Claims must be filed with the Probate Court of this county and delivered or mailed to the Personal Representative appointed to administer the estate (see Section 62-3-803, 62-3-804 and 62-3-806 on reverse)

The law provides that a creditor has up to thirty days from mailing of notice of disallowance to file a petition for the allowance of the claim (Form #373PC) in the Probate Court or to commence a proceeding on the claim against the Personal Representative (see Section 62-3-806 on reverse) Failure to file such a petition or to commence such a proceeding will result in the claim being forever barred

SOUTH CAROLINA CODE OF LAWS, 1976, AS AMENDED

§ 62-3-803 Limitations on presentation of claims

"(a) All claims against a decedent's estate which arose before the death of the decedent including claims of the State and any subdivision thereof, whether due or to become due, absolute or contingent, liquidated or unliquidated, founded on contract, tort, or other legal basis, if not barred earlier by other statute of limitations are barred against the estate, the personal representative the heirs and devisees of the decedent, unless presented within the earlier of the following dates

- (1) one year after the decedent's death or
- (2) within the time provided by Section 62-3-801(b) for creditors who are given actual notice, and within the time provided in Section 62-3-801(a) for all creditors barred by publication, provided, claims barred by the nonclaim statute at the decedent's domicile before the giving of notice to creditors barred in this State are also barred in this State

(b) All claims against a decedent's estate which arise at or after the death of the decedent, including claims of the State and any subdivision thereof whether due or to become due, absolute or contingent, liquidated or unliquidated, founded on contract tort, or other legal basis, are barred against the estate, the personal representative, and the heirs and devisees of the decedent, unless presented as follows

- (1) a claim based on a contract with the personal representative within eight months after performance by the personal representative is due
- (2) any other claim, within the later of eight months after it arises, or the time specified in subsection (a) (1)
- (c) Nothing in this section affects or prevents
 - (1) any proceeding to enforce any mortgage, pledge, lien, or other security interest upon property of the estate, or
 - (2) to the limits of the insurance protection only, any proceeding to establish liability of the decedent or the personal representative for which he is protected by liability insurance, or
 - (3) collection of compensation for services rendered and reimbursement for expenses advanced by the personal representative or by the attorney or accountant for the personal representative of the estate "

§ 62-3-804 Manner of presentation of claims

"Claims against a decedent's estate may be presented as follows

- (1) The claimant may deliver or mail to the personal representative a written statement of the claim indicating its basis, the name and address of the claimant and the amount claimed and must file a written statement of the claim in the form prescribed by rule with

the clerk of the probate court. The claim is deemed presented on the first to occur of receipt of the written statement of claim by the personal representative, or the filing of the claim with the court. If a claim is not yet due, the date when it will become due must be stated. If the claim is contingent or unliquidated, the nature of the uncertainty must be stated. If the claim is secured, the security must be described. Failure to describe correctly the security, the nature of any uncertainty, and the due date of a claim not yet due does not invalidate the presentation made.

- (2) The claimant may commence a proceeding against the personal representative in any court where the personal representative may be subjected to jurisdiction, to obtain payment of his claim against the estate, but the commencement of the proceeding must occur within the time limited for presenting the claim, and the claimant must file a written statement of the claim as in (1) above, with the clerk of the probate court. No presentation of claim is required in regard to matters claimed in proceedings against the decedent which were pending at the time of his death.
- (3) If a claim is presented under subsection (1), no proceeding may be commenced more than thirty days after the personal representative has mailed a notice of disallowance with warning of the impending bar, but, in the case of a claim which is not presently due or which is contingent or unliquidated, the personal representative may consent to an extension of the thirty day period, or to avoid injustice the court, on petition presented to the court prior to the expiration of such thirty day period, may order an extension of the thirty day period, but in no event may the extension run beyond the applicable statute of limitations "

§ 62-3-806 Allowance of claim

"(a) As to claims presented in the manner described in Section 62-3-804 within the time limit prescribed in Section 62-3-803, the personal representative may mail a notice to any claimant stating that the claim has been disallowed. If, after allowing or disallowing a claim, the personal representative changes his decision concerning the claim, he shall notify the claimant. The personal representative may not change a disallowance of a claim after the time for the claimant to file a petition for allowance or to commence a proceeding on the claim has run and the claim has been barred. Every claim which is disallowed in whole or in part by the personal representative is barred so far as not allowed unless the claimant files a petition for allowance in the court or commences a proceeding against the personal representative not later than thirty days after the mailing of the notice of disallowance of partial allowance if the notice warns the claimant of the impending bar. It is the responsibility of the personal representative to notify the claimant if a claim is disallowed "

ALSO SEE TITLE 62, ARTICLE 3 PART 8 (I E , SECTIONS 62-3-801, ET SEQ)

STATE OF SOUTH CAROLINA)

COUNTY OF AIKEN)

JAMES JOE BROWN JR)
Plaintiff)

vs)

TOMMIE RAE HYNE AHMED BROWN,)
Defendant)

IN THE FAMILY COURT

SECOND JUDICIAL CIRCUIT

CASE NUMBER 04 DR 00000000

AMENDED SUMMONS

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN
I, _____, Clerk of (Civil) Court, do hereby certify
that the foregoing constitutes a true and correct copy of the
original document which has been filed in my office this

MAR 16 2007

CCCCP & U.S. District Court
Deputy Clerk

TO THE DEFENDANT NAMED HEREINABOVE

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action,
a copy of which is herewith served upon you, and to serve a copy of your Answer to said
Complaint on the subscriber at 1417 Georgia Avenue, North Augusta, South Carolina within
thirty (30) days from the service hereof exclusive of the date of such service, and if you fail to
answer the Complaint within the time aforesaid, judgment by default will be rendered against
you for the relief demanded in the Complaint

James B Huff
Attorney for Plaintiff
P O Box 6488
North Augusta SC 29841
(803) 278-2889 (Office)
(803) 442-4422 (Fax)
SC Bar # 2769

North Augusta, South Carolina
May 5, 2004

FILED
AIKEN COUNTY
MAY - 6 2004
1:55pm
CLERK OF COURT

STATE OF SOUTH CAROLINA)

COUNTY OF AIKEN)

JAMES JOE BROWN, JR.,)
Plaintiff)

vs)

TOMMIE RAE HYNE AHMED BROWN,)
Defendant)

IN THE FAMILY COURT

SECOND JUDICIAL CIRCUIT

CASE NUMBER 04-DR-002

AMENDED COMPLAINT FOR
ANNULMENT

MAR 16 2007

FILED

AIKEN COUNTY

MAR 16 2004

4:55p

CLERK OF COURT

Plaintiff alleges that

1 Plaintiff and Defendant are both citizens and residents of the State of South Carolina, County of Aiken and have so been for more than three (3) months next preceding the commencement of this action

2 The parties obtained a marriage license in Aiken County on December 10, 2001 In obtaining this license the Defendant informed the Probate Court and the Plaintiff that this was her first marriage (A copy of this marriage license is attached hereto and incorporated by reference thereto)

3 Prior to obtaining this marriage license the Defendant did not inform the Plaintiff that she had been married before or that she was still married to Mr Javed Ahmed

4 The parties conducted a marriage ceremony on December 14, 2001, in Aiken County, South Carolina

5 At the time of the marriage ceremony on December 14, 2001 in Aiken County, South Carolina, Defendant was still legally married to Mr Javed Ahmed and by way of such legal impediment was legally barred from entering into a marriage to the Plaintiff pursuant to §20 1-80, South Carolina Code of Laws, as amended

6 Subsequent to their marriage ceremony, Plaintiff learned that Defendant had been married and was still married to Mr Javed Ahmed

7 On December 15, 2003 the Defendant filed an annulment action against Mr Ahmed in Charleston County, South Carolina in case number 03-DR-10-4609 (A copy of which is attached hereto and incorporated by reference)

8 The Charleston County Family Court made Findings of Facts and Conclusions of Law that the Defendant was in fact married to Mr Ahmed on February 17, 1997

9 The Charleston Family Court granted the Defendant an annulment on April 15, 2004 (A copy of this Order is attached hereto and incorporated by reference)

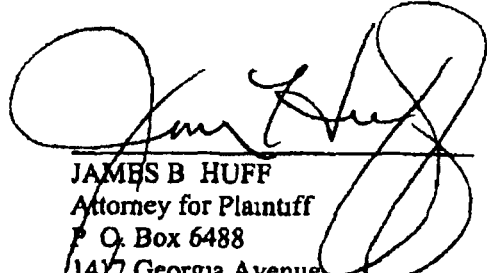
10 Defendant, in that action, has not filed any appeal from the Family Court Order and as such, the Findings of Facts of the Charleston Family Courts are binding on this Court

11 Pursuant to the Order from the Charleston Family Court, Defendant is collaterally and judicially estopped from denying the allegations in this action

12 Plaintiff is entitled to an annulment from the Defendant

13 Plaintiff is informed and believes the Defendant should be responsible for any reasonable and necessary attorneys fees and costs in the bringing of this action However, should Defendant not contest Plaintiff's request for an annulment, Plaintiff would withdraw his request for attorney fees and costs

WHEREFORE, Plaintiff prays that this Court issue its Judgment granting to Plaintiff the relief requested in the Complaint and granting such other and further relief as to the Court may deem just and proper



JAMES B HUFF
Attorney for Plaintiff
P. O. Box 6488
1417 Georgia Avenue
North Augusta, SC 29841-6488
(803) 278-2889
SC Bar # 2769

North Augusta, South Carolina
May 5, 2004

STATE OF SOUTH CAROLINA)
COUNTY OF AIKEN)
JAMES JOE BROWN, JR ,)
Plaintiff,)
vs)
TOMMIE RAY HYNE AHMED BROWN,)
Defendant)

COURT OF COMMON PLEAS
CASE NO 04 DR 02 157

ANSWER AND COUNTERCLAIM

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN
I, Clerk of the Court of Common Pleas and General Sessions for the County of Aiken, South Carolina, do hereby certify that the foregoing documents are a true and correct copy of the original documents which have been filed in my office this

MAR 16 2007

FILED
AIKEN COUNTY

JUN 14 2004

8 30am
CLERK OF COURT

J. E. G. Gendelman
Deputy Clerk

Defendant Tommie Rae Hynie Brown, incorrectly identified in the caption herein as Tommie Ray Hyne Ahmed Brown, answering the Plaintiff's Amended Complaint For Annulment, alleges and states as follows

- 1 Defendant denies each and every allegation of the Amended Complaint. Specifically admitted, modified or explained herein and demands strict proof thereof
- 2 Defendant admits the allegations of paragraphs 1 and 2
- 3 Defendant admits the allegations of paragraph 3 to the extent that she did not inform the Plaintiff that she had previously been married, but states affirmatively that she believed her previous marriage to Javed Ahmed had been annulled
- 4 Defendant admits the allegations of paragraph 4
- 5 Defendant denies the allegations of paragraph 5 and states affirmatively that the marriage to Javed Ahmed has been judicially declared to be void *ab initio* and consequently never existed and that such determination is *res judicata* and cannot be challenged by the Plaintiff in the present proceeding
- 6 Defendant admits that the Plaintiff may have concluded that Defendant was and is married to Javed Ahmed but the Plaintiff's legal conclusions are in error and are denied
- 7 Defendant admits the allegations of paragraph 7

8 Defendant denies the allegations of paragraph 8 and states affirmatively that the Family Court Order referenced in fact declared that the aforesaid marriage to Javed Ahmed was void *ab initio* and consequently never existed in the eyes of the law

9 Defendant admits the allegations of paragraphs 9 and 10

10 Defendant denies the allegations of paragraphs 11, 12, and 13

FURTHER ANSWERING AND BY WAY OF COUNTERCLAIM,
THE DEFENDANT ALLEGES

11 The parties are citizens and residents of Aiken County, South Carolina, and have been so for a period in excess of one (1) year prior to the commencement of this action

12 The parties are husband and wife, having been married on December 14, 2001 in Aiken, County, South Carolina. One child has been born of this marriage, to wit James [REDACTED] born on June 11, 2001

13 Although prior to Defendant's marriage to the Plaintiff she had previously gone through a marriage ceremony with one Javed Ahmed, that marriage was procured by a fraud upon Defendant by said Javed Ahmed, the marriage was never consummated, and the marriage was subsequently annulled and declared to be wholly null and void *ab initio* by this Court on April 15, 2004

14 The parties hereto separated on or about January 28, 2004, due to the Plaintiff's assault on and physical abuse of Defendant. On that date, the Plaintiff physically assaulted Defendant during an altercation in which he picked up a chair and slammed it on Defendant's head, causing her to crash to the floor. Defendant was frightened of the Plaintiff and dialed "911". Law enforcement came to the scene to ensure the safety of Defendant and the parties' minor child. As a result of this incident, the Plaintiff was immediately arrested for Criminal Domestic Violence. While incarcerated, the Plaintiff had certain personal items

belonging to Defendant removed from the marital residence and requested that Defendant and the minor child leave the marital residence

15 Defendant alleges that the Plaintiff has a violent temper and has assaulted her on numerous occasions in which he has broken and dislocated bones in her body, has caused severe bruising and scrapes, and has caused damage to their marital home and Defendant's personal belongings

16 The Plaintiff has been both emotionally and verbally abusive to Defendant. Defendant alleges that the Plaintiff has committed acts of violence upon Defendant and also yells, threatens, demeans, and disparages Defendant and calls Defendant and Defendant's mother vulgar names in the presence of their minor child and the Plaintiff's employees. Defendant alleges that the Plaintiff also engages in acts of violence and verbal abuse by yelling and demeaning the parties' minor child

17 Defendant alleges that the Plaintiff has created an environment which has made it extremely difficult for Defendant to continue to live with the Plaintiff and that he has caused her great emotional upset

18 Despite the oppressive and abusive atmosphere created by the Plaintiff, Defendant has successfully raised the parties' child and has been the primary parent to their minor son. Defendant states she has taken excellent care of the minor child. Defendant alleges that he is entitled to an order granting her sole custody of the minor child, *pendente lite* and permanently, with reasonable and/or supervised day time visitation to the Plaintiff

19 The parties are both entertainers and at times travel extensively for business. During the times the parties are working and traveling, the minor child's maternal grandmother, Cleo Douglas, is the nanny and the caretaker of the minor child. Defendant alleges that the Plaintiff has consistently paid Ms. Douglas \$1000 per week for the caretaking of the minor

child and an additional \$400 per month for clothing and personal needs of the minor child Defendant alleges that the Plaintiff has not been consistent with these payments since January 2004 Defendant further alleges that the financial needs of the minor child are not being met on a monthly basis

20 Defendant alleges that until the Spring 2004 tour, she was employed by James Brown Entertainment as the Plaintiff's back up singer Defendant alleges that during the Spring 2004 tour, the Plaintiff continued to humiliate, harass and verbally abuse Defendant while she was working Defendant further alleges that the Plaintiff worked himself into a fit of rage, threatened Defendant, and fired her as his back up singer The Plaintiff abandoned Defendant in Las Vegas without adequate arrangements to return to South Carolina Defendant's income has drastically been affected by the Plaintiff's volatile and unwarranted behavior

21 Since the separation of the parties, Defendant and the minor child have resided in Defendant's separate dwelling at 218 Crytal Springs Road, Graniteville, South Carolina Defendant alleges that she is entitled to an Order allowing her the sole use, possession and control of her non-marital residence and contents therein, *pendente lite* and permanently, and that she be granted the right to change the locks and/or install a security system

22 Defendant is informed and believes that she is entitled to an Order requiring the Plaintiff to be solely responsible for all costs associated with her residence including the note, mortgage, reasonable and necessary maintenance, telephone, cable, gas, electric, security service, internet service, water, pool and yard maintenance insurances and taxes, retroactively and in the future, *pendente lite* and permanently

23 Defendant is informed and believes that she is entitled to an award of alimony and/or spousal support, including retroactive alimony and rehabilitative alimony/support from Defendant *pendente lite* and permanently

24 Defendant is informed and believes that she is entitled to an Order awarding her the sole, exclusive possession, and control of the personal property in her possession, *pendente lite* and permanently

25 Defendant alleges that the Plaintiff has several items of valuable non marital items of personal property which are situated at the marital residence Defendant is informed and believes that she is entitled to an Order requiring the Plaintiff to immediately deliver these and any other items belonging to Defendant and their minor child

26 Defendant is informed and believes that she is entitled to an Order awarding her the exclusive use and possession of her non martial Lincoln Mark VIII, which was purchased prior to the parties' marriage, and the 2004 Lincoln Navigator, 2003 BMW Z4, 98 Jaguar and Mercedes SL Convertible, which are four of approximately twelve of the automobiles which were purchased by the parties during their marriage Defendant alleges she is entitled to an Order requiring the Plaintiff to be solely responsible for the loan payments, notes, insurances, taxes, maintenance, and any other expenses associated with these automobiles, *pendente lite* and permanently

27 Defendant alleges she is entitled to an Order requiring the Plaintiff to maintain all life insurance policy(ies) on his life for the benefit of the Defendant and the parties' minor child which were in force prior to the parties' separation, and requiring Plaintiff to timely pay all premiums and name Defendant as the beneficiary of said policy(ies) in the amount he was insured prior to the separation, or, in the alternative, to provide \$2,000,000 in life insurance on his life for the benefit of the Defendant and the minor child

28 Defendant alleges that over the course of the parties' marriage, in a fit of rage, the Plaintiff has canceled the health insurance coverage of Defendant and the parties' minor child. Defendant is informed and believes that she is entitled to an Order requiring the Plaintiff to maintain health, medical, and dental insurance on her and the minor child, to timely make all payments and to be solely responsible for any reasonable and necessary medical, health, dental and counseling costs and any other expenses of the parties and/or the minor child which are not covered by insurance. In the event the Plaintiff has canceled any of the policies, the Plaintiff should be required to obtain insurance coverage equivalent to or better than that which existed prior to the parties' separation, and should be responsible for any bills incurred as a result of the Plaintiff's unwarranted cancellation of said policies.

29 Defendant is informed and believes that the Plaintiff has committed acts of adultery with one or more individuals.

30 Defendant is informed and believes that she is entitled to a divorce, a *vinculo matrimonii*, on the grounds of physical cruelty and adultery.

31 Defendant is informed and believes that she is entitled to an equitable apportionment of marital property pursuant to the statutory factors set forth in the Equitable Apportionment Act, (*retroactively and progressively*), *pendente lite* and permanently.

32 Defendant alleges that the Plaintiff's income is over the standard guidelines for child support and therefore, is informed and believes that she is entitled to an award of substantial child support to be paid by the Plaintiff pursuant to the needs of the minor child, including retroactive child support, *pendente lite* and permanently.

33 In addition to child support, Defendant alleges that she is entitled to an Order requiring the Plaintiff to be solely responsible for any and all costs and expenses associated with the minor child including, but not limited to, nanny fees and costs, school tuition, fees,

costs, books, supplies, clothes school expenses, extra curricular expenses, allowances camps and the like, *pendente lite* and permanently

34 Defendant alleges that the Plaintiff owns several businesses and entities such as James Brown Entertainment and Seventh Decade Entertainment Defendant alleges that she assisted in the continued success of her husband's businesses and that she contributed to the increase in value of his non marital assets In addition, Defendant alleges she was the Plaintiff's makeup artist and hairdresser and acted as his caretaker whenever he became ill Defendant jointly pledged their personal assets to assist in certain purchases and in the continued success of the Plaintiff's businesses, with the understanding that they would also share in the profitability of the businesses While Defendant believes the Plaintiff is extremely wealthy, Defendant believes that the Plaintiff may hide or fail to disclose his true income, profits of the Plaintiff and the Plaintiff's businesses and entities, as well as their contractual rights and advantages arising from these businesses and ventures In particular, Defendant is informed and believes that the Plaintiff will conspire to exclude her from certain profits, including but not limited to such marital property as management fee contracts and other contractual and/or equitable rights arising out of his many businesses and entities

35 Defendant alleges that on numerous occasions, the Plaintiff has threatened to sell, transfer, deplete or secret the businesses and entities and their assets Defendant believes that the Plaintiff may deplete, transfer or otherwise dispose of the businesses and entities and/or the parties interest in the business

36 Defendant is informed and believes that the Plaintiff may be involved in a number of contracts involving and relating to marital property and/or assets, and that there are significant issues involving the apportionment, control and contractual rights concerning the

marital assets and the construction and enforcement of these contracts which relate to and involve marital property and/or assets

37 Defendant is informed and believes that she is entitled to an Order restraining and enjoining the Plaintiff from encumbering, disposing, conveying, damaging, transferring, moving, altering, secreting, selling, disposing of, exercising contractual options, liquidating, depleting or otherwise reducing the value of the parties' marital assets, or in any way causing the value of James Brown Entertainment, Seventh Decade Entertainment, or his other businesses or any entities and any assets of the parties to decrease, except for in the normal course of business

38 Defendant is informed and believes that she is entitled to an Order restraining and enjoining the Plaintiff from exercising any contractual options or enforcing any contractual agreements involving James Brown Entertainment, Seventh Decade Entertainment or his other businesses or other entities, and any assets of the parties

39 Defendant is informed and believes that she is entitled to an Order restraining the Plaintiff from interrupting or interfering with Defendant's custodial periods for any reason whatsoever, *pendente lite* and permanently

40 Defendant is informed and believes that she is entitled to an Order restraining the Plaintiff from denigrating her, embroiling the minor child in the parties' differences, from discussing this litigation with the minor child, or in the earshot of the minor child, from communicating to Defendant through the minor child, from alienating the minor child's affections from his mother, from disparaging or criticizing Defendant to the minor child, in the presence of the minor child, or within an earshot of the minor child from disparaging, criticizing, denigrating, yelling or saying anything derogatory to the minor child, and from

allowing other persons from doing any of these acts in the presence of or within earshot of the minor child *pendente lite* and permanently

41 Defendant is informed and believes that she is entitled to an Order restraining the Plaintiff from harassing, abusing, threatening, molesting or interfering with Defendant, her family, friends or witnesses in any way, and from disrupting, entering or attempting to enter her residence, property or place of business *pendente lite* and permanently

42 Defendant is without any funds to pay her attorneys, accountants, expert witnesses, and costs of this litigation Defendant is informed and believes that the Court should order the Plaintiff to pay Defendant a significant amount of attorneys fees, costs, experts fees, investigator s fees and costs of this litigation, *pendente lite* and permanently

43 Defendant is informed and believes that she is entitled to discovery under the South Carolina Rules of Civil Procedure

WHEREFORE, Defendant respectfully prays that this Court to dismiss the Complaint herein and to enter an Order granting the following relief

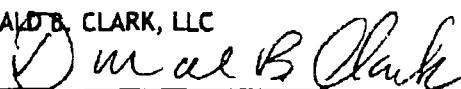
- 1 Granting the Defendant a divorce a vinculo matrimonii, on the grounds of physical cruelty and adultery
- 2 Granting the Defendant a decree of separate maintenance and support
- 3 Granting the Defendant sole custody of the minor child, with visitation granted to the Plaintiff, *pendente lite* and permanently
- 4 Granting the Defendant the sole use, possession and control of her home, *pendente lite* and permanently, and that she be granted the right to change the locks and/or install a security system
- 5 Requiring Plaintiff to be solely responsible for all costs associated with her residence including the note, mortgage, reasonable and necessary maintenance, telephone, cable, gas, electric, security service, internet service, water, pool and yard maintenance insurances and taxes, retroactively and in the future, *pendente lite* and permanently

- 6 Requiring Plaintiff to pay to Defendant an award of alimony and/or spousal support, including retroactive permanent, periodic, lump sum reimbursement and rehabilitative alimony and support from Plaintiff *pendente lite* and permanently
- 7 Awarding the Defendant the sole, exclusive possession, and control of the personal property in her possession, *pendente lite* and permanently
- 8 Requiring the Plaintiff to immediately return any and all items belonging to the Defendant and minor child which are in his possession
- 9 Awarding Defendant the exclusive use and possession of the Awarding Defendant the exclusive use and possession of the Mark VIII automobile which she obtained prior to the marriage as well as the Lincoln Navigator, 2003 BMW Z4, 98 Jaguar and Mercedes SL Convertible, and for the Plaintiff to be solely responsible for any and all loans, reasonable and necessary maintenance, taxes, and insurance on these automobiles, *pendente lite* and permanently
- 10 Requiring the Plaintiff to maintain all life insurance policy(ies) on his life for the benefit of the Defendant and the parties' minor child which were in force prior to the parties' separation, and requiring Plaintiff to timely pay all premiums and name Defendant as the beneficiary of said policy(ies) in the amount he was insured prior to the separation, or, in the alternative, to provide \$2 000,000 in life insurance on his life for the benefit of the Defendant and the minor child, *pendente lite* and permanently
- 11 Requiring Plaintiff to maintain health, medical, and dental insurance on the parties and minor child, to timely make all payments and to be solely responsible for any reasonable and necessary medical, health, dental and counseling costs and/or expenses of the parties and/or the minor child which are not covered by insurance, *pendente lite* and permanently
- 12 In the event Plaintiff cancelled said coverage, for an Order Requiring Plaintiff to obtain insurance coverage shall be the same, or better, than it was prior to the separation
- 13 Awarding the Defendant child support to be paid by the Plaintiff pursuant to the child support guidelines, including retroactive child support, *pendente lite* and permanently
- 14 Requiring the Plaintiff to be solely responsible for any and all costs and expenses associated with the minor child including, but not limited to, school tuition, fees, costs, books, supplies, clothes, school expenses, extra curricular expenses, allowances, camps and the like *pendente lite* and permanently
- 15 Restraining and enjoining the Plaintiff from encumbering, disposing, conveying, damaging, transferring, moving, altering, secreting, selling, disposing of, exercising contractual options, liquidating, depleting or otherwise reducing the value of the

parties' marital assets, or in any way causing the value of James Brown Entertainment, Seventh Decade Entertainment, or his other businesses or any entities, and any assets of the parties to decrease, except for in the normal course of business, *pendente lite* and permanently

- 16 Restraining and enjoining Plaintiff from exercising any contractual options or enforcing any contractual agreements involving James Brown Entertainment, Seventh Decade Entertainment, or his other businesses or any entities, and any assets of the parties, *pendente lite* and permanently
- 17 Restraining and enjoining Plaintiff from interrupting or interfering with the Defendant's custodial periods for any reason whatsoever, *pendente lite* and permanently
- 18 Restraining and enjoining Plaintiff from demigrating Plaintiff, embroiling the minor child and the child's friends in the parties' differences, from discussing this litigation with the child, or in the earshot of the child, from communicating to the Defendant through the child, from alienating the child's affections from his mother, from disparaging or criticizing the Defendant to the child, in the presence of the child, or within earshot of the child, and from allowing other persons from doing any of these acts in the presence of or within earshot of the child *pendente lite* and permanently
- 19 Restraining and enjoining the Plaintiff from harassing, abusing, threatening, molesting or interfering with the Defendant, her family, friends or witnesses in any way, and from disrupting, entering, or attempting to enter her residence, property or place of business, *pendente lite* and permanently
- 20 Awarding Defendant attorneys fees, costs, experts fees, investigator's fees and costs from Plaintiff in the amount of \$100,000
- 21 For an Order of discovery pursuant to the South Carolina Rules of Civil Procedure

DONALD B. CLARK, LLC



Donald B. Clark
49 Immigration Street, Suite 204
Charleston, SC 29403
843 720 8866

ROSEN LAW FIRM, LLC

Robert N. Rosen
134 Meeting Street, Suite 202
Charleston, SC 29401
843-377 1700

June ____, 2004
Charleston, South Carolina

STATE OF SOUTH CAROLINA)
COUNTY OF AIKEN)
JAMES JOE BROWN, JR.,)
Plaintiff)
vs)
TOMMIE RAE HYNE AHMED BROWN,)
Defendant)

IN THE FAMILY COURT
SECOND JUDICIAL CIRCUIT
CASE NUMBER. 04-DR-000000
REPLY TO COUNTERCLAIM

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN
J. L. BROWN, JR., Clerk of Court
I, J. L. BROWN, JR., Clerk of Court of Aiken County, South Carolina do hereby certify that the foregoing is a true and correct copy of the original documents as they have been filed in my office this

11 / MAR 16 2007

[Signature]
Clerk of Court
J. L. BROWN, JR.
Clerk of Court

The Plaintiff, in replying to the Counterclaim of the Defendant, would show as follows

- 1 Plaintiff denies each and every allegation as set forth in Defendant's Counterclaim unless hereinafter specifically admitted or explained and realleges the allegations of the Complaint as set out herein verbatim.
- 2 Plaintiff admits paragraph 11 and 21 of the Counterclaim.
- 3 Plaintiff denies paragraph 12 of the Counterclaim and re-alleges paragraphs 2 through 6 of Plaintiff's Amended Complaint as if set forth herein Plaintiff is informed and believes that due the fact that Defendant was still married to another person at the time the parties obtained a marriage license that the court should determine the parties parentage by providing that the parties conduct genetic testing in this matter
- 4 Plaintiff has insufficient information to admit all of paragraph 13 of Defendant's counterclaim but admits so much as states the Defendant was married to Javed Ahmed prior to the marriage ceremony to Plaintiff Also, that Defendant remained legally married to this man at the time she entered into a marriage ceremony with Plaintiff Further, that after Plaintiff commenced his present lawsuit action from

AIKEN COUNTY

JUL 06 2007
12:51 PM
CLERK OF COURT

from the Charleston County Family Court

5 Plaintiff admits so much of paragraph 14 of the Counterclaim that states Defendant
dialed "911" on January 28, 2004 and that Plaintiff was arrested on that day Plaintiff
denies the remainder of the paragraph

6 Plaintiff denies paragraphs 15,16 17,18,20,22 through 40 and 42 of the
Counterclaim

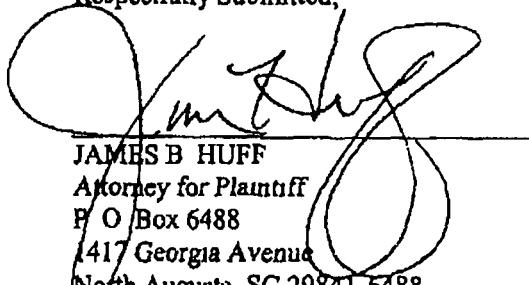
7 Plaintiff admits so much of paragraph 19 of the Counterclaim that states Plaintiff has
paid monies to Cleo Douglas in the past

8 Plaintiff admits so much of paragraph 41 of the Counterclaim that states a restraining
order should be issued but alleges that if issued that the court should provide that it
be mutually binding on both parties

9 Plaintiff admits so much of paragraph 43 of the Counterclaim that the parties would
be allowed discovery which the court would deem appropriate and un-abusive

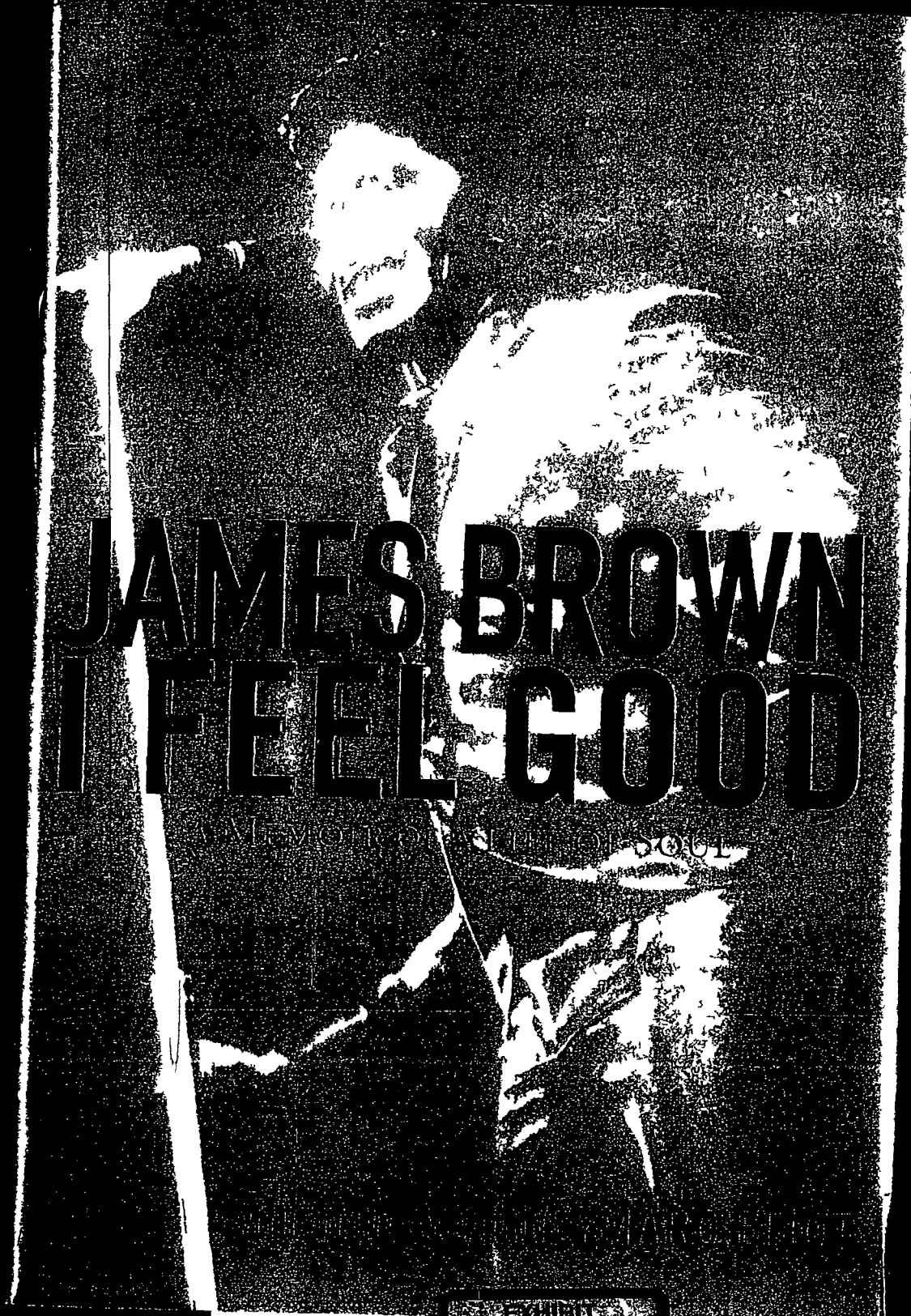
WHEREFORE, after fully setting forth his Reply, the Plaintiff requests that the Defendant's
Counterclaim be dismissed with costs and fees awarded to the Plaintiff

Respectfully Submitted,



JAMES B HUFF
Attorney for Plaintiff
P O Box 6488
1417 Georgia Avenue
North Augusta, SC 29841-6488
(803) 278-2889
SC Bar # 2769

North Augusta, South Carolina
July 3, 2004



JAMES BROWN I FEEL GOOD

A NEW YORK FILM OF SOUL

2903

EXHIBIT 3
6



James Brown with his wife Tomi Rae Brown receiving the prestigious Kennedy Center Honor for his lifetime contribution to the arts on December 7 2003 in Washington D C
FROM THE COLLECTION OF THE AUTHOR



As long as the fire still burns in his heart James Brown will continue to wow audiences worldwide Here he is performing his trademark cape drama with longtime MC Danny Ray
FROM THE COLLECTION OF THE AUTHOR

I FEEL GOOD

myself engulfed in one of the worst emotional lows in life. What kicked this latest visit to the low valley was yet another episode of financial desperation the result of a long-time legal dispute over my music publishing. Because of all my problems with the IRS, I had no real money saved, and as I had not had a hit record in a while, not a lot of money was coming in. One day I looked around and realized that after all this time and after all that I had accomplished, I still really didn't have anything in the way of security for the future. The bottom line was that my life had been surrounded by those characters who had come to take and not to give.

On top of that, I had recently ventured once more into the world of matrimony. Having gotten over the tragedy of Adrienne's death, and not wanting to face the last years of my life alone, I decided that the time had come to find myself a companion. I was ready to meet someone new, and fall in love again and that's exactly when I met a young singer Tomi Rae, who was working the rooms in Las Vegas doing an act based on the life of Janis Joplin.

Although the attraction between Miss Rae and me was strong, I was hesitant to get involved with her because of the great age difference between us. I was in my sixties, and she was in her late twenties. As a general rule, I would warn against anyone marrying a person with more than a ten-year age difference. It almost never works. It is difficult to find things to talk about, to use similar reference

JAMES BROWN

points and to operate at the same speed of life. Another problem is that both sides usually don't want the same things at the same time.

Children, for instance. It's very difficult to be the father of even one child in a man's life. I happen to be the father of many, but with a younger woman, the talk inevitably turns to starting a new family, and it's hard to go down that road all over again after you've seen your children from earlier marriages grow into adulthood. When a man is older, he has a tendency to feel he has done his part. He wants to relax and spend time with just his woman. A young girl, however, has all that ahead of her. This is an issue couples have to be straight on and agree on before they walk down that aisle; otherwise there is no way their marriage will survive.

Ironically, one of the biggest issues between Adrienne and me had been children. We both wanted them but couldn't seem to have them. I had built a beautiful home for her and the family we had both hoped to have. I had wanted her to feel she was living with an ambassador, which, in many ways, I had become. For myself, I never needed much. I could just as easily live in a small place and that would be just fine with me, but I wanted her to feel that she had the best.

Now, having married Tomi Rae Brown, I once again much to my amazement, wanted children. And happily, so did she. We started living together in the big house in South

JAMES BROWN

world, but it wouldn't be nothin' without a woman or a girl
To that end, it's important to be with someone who understands your life. I believe Anna Nicole Smith understood her husband's life, and because Tomi Rae Brown is a musician, I believe she understands mine.

Of course, the fact that she's beautiful, well, there is also that sugar and spice I love to sing and write about!

Still, it was also hard to avoid the fact that we were from two completely different heritages. She's Norwegian and I am my own trail mix, and because of it there was little we had that we could talk about without trying to cross some high degree of generational and social hurdles. No matter what, those barriers were always going to be there. And because of it, I could never completely get into Tomi Rae Brown's head, nor she into mine. But that didn't stop me from trying to teach her about what it meant to share a life with someone, and how to keep the fires burning inside, now and in the future.

One of the happiest days of our marriage was when Tomi Rae Brown gave birth to our little baby boy. She was now the mother of our offspring, and neither of us would ever forget that or let the other down for the sake of our child. And both of us vowed never to forget that.

That's why, for all the generational and cultural barriers that we had to break through as a couple, I never regretted a single moment of being with her, even when the unusual circumstances of our marriage thrust me back into the

JAMES BROWN

But most of all I want to help young people to understand the importance of *believing in themselves*. Then, try to earn a living with your art. Always honor your mother and father, and choose a way to God, any path you want as long as you have one. Even when you make it, if you're that lucky, I would say to invest your earnings in something that will always provide a backup. If I were starting out today I'd go into the heating and air-conditioning field. These are two things everyone needs and always will need. It could provide plenty of income between those hit songs, or those big bookings. I'd say don't spend your money on just the girls (or the boys) and the good times, create something for yourself that will provide income for you for when the hits stop coming.

Finally I want to say one thing. I still have my faith, I still have my integrity, I still got my funk, and I still got my soul. I love my children and I love my wife very much, and I know that she is going to be all right because she's young and has a lot ahead of her. As for me like Sinatra was, I'm in the prime of my life in my early seventies, and it's better now than it's ever been. Nothing about living to me is trivial. Money or fame, nothing can touch me in a bad way. As long as I have three things—my health, my integrity, and my family—nothing else really matters. I will never be brought down, because I *can't* be brought down. I have a pride that cannot be broken, that cannot be trampled.

**THE STATE OF SOUTH CAROLINA
IN THE Supreme COURT**

**APPEAL FROM AIKEN COUNTY
Court of Common Pleas**

**Doyet A Early, III, Circuit Court Judge
Case No 2008-CP-2-1647**

Alan Wilson, in his capacity as Attorney General of the State of South Carolina, Daryl J Brown, on behalf of his minor children, Lindsey B and Janise B , Deanna J Brown Thomas, on behalf of her minor child, Jason L , Yamma N Brown, on behalf of her minor children, Sydney L , Carrington L , and Tonya B , Vanisha Brown, Larry Brown, Tommie Rae Hynie Brown, and James B , through his Guardian ad Litem, Respondents,

v

Albert H Dallas, Alfred A Bradley, and David G Cannon, Individually and as (purported) Trustees of the James Brown 2000 Irrevocable Trust, Adele J Pope and Robert L Buchanan, Jr , Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust, Terry Brown, Romunzo Brown, Forlando Brown, Cinnamon N M Paris, LaRhonda Petitt, Jeanette Mitchell, and Russell L Bauknight, as Special Administrator and Special Trustee for The Estate of James Brown and The James Brown 2000 Irrevocable Trust,

of whom Robert L Buchanan, Jr , and Adele J Pope, as Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust are, Appellants,

and Albert H Dallas, Alfred A Bradley, and David G Cannon, Individually and as (purported) Trustees of the James Brown 2000 Irrevocable Trust, Terry Brown, Romunzo Brown, Forlando Brown, Cinnamon N M Paris, LaRhonda Petitt, Jeanette Mitchell, and Russell L Bauknight, as Special Administrator and Special Trustee for The Estate of James Brown and The James Brown 2000 Irrevocable Trust are Respondents

In re The Estate of James Brown and The James Brown 2000 Irrevocable Trust u/a/d August 1, 2000

RULE 210(g) CERTIFICATE

Pursuant to Rule 210(g), SCACR, I hereby certify that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material

A handwritten signature in black ink, reading "James B. Richardson, Jr.", with a stylized flourish at the end.

James B Richardson, Jr
1229 Lincoln Street
Columbia, South Carolina 29201
(803) 799-9412

March 1, 2011

Attorney for Appellants

**THE STATE OF SOUTH CAROLINA
IN THE Supreme COURT**

**APPEAL FROM AIKEN COUNTY
Court of Common Pleas**

**Doyet A Early, III, Circuit Court Judge
Case No 2008-CP-2-1647**

RECEIVED

MAR 11 2011

SC Supreme Court

Alan Wilson, in his capacity as Attorney General of the State of South Carolina, Daryl J Brown, on behalf of his minor children, Lindsey B and Janise B , Deanna J Brown Thomas, on behalf of her minor child, Jason L , Yamma N Brown, on behalf of her minor children, Sydney L , Carrington L , and Tonya B , Vanisha Brown, Larry Brown, Tommie Rae Hynie Brown, and James B , through his Guardian ad Litem, Respondents,

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In re The Estate of James Brown and The James Brown 2000 Irrevocable Trust u/a/d August 1, 2000

PROOF OF SERVICE

I certify that on the 9th day of March, 2011, I have served the Record on Appeal on Respondents as shown below by depositing a copy of same in the United States Mail, postage prepaid, addressed to their attorneys of record as follows

Louis Levenson, Esquire
Levenson & Associates
125 Broad Street, SW
Atlanta, Georgia 30303
Telephone 404-659-5000

Attorney for Respondents Daryl J Brown, on Behalf of His Minor Children, Lindsey B and Janise B , Deanna J Brown Thomas, on Behalf of Her Minor Children, Jason L , Yamma N Brown, on Behalf of Her Minor Children, Sydney L , Carrington L , and Tonya Brown, Vanisha Brown, and Larry Brown

Robert N Rosen, Esquire
T Heyward Carter, Jr , Esquire
S Alan Medlin, Esquire
David L Michel, Esquire
Thornton Morris, Esquire
Post Office Box 1510
Charleston, South Carolina 29402
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