

# EXHIBIT D



ALAN WILSON  
ATTORNEY GENERAL

**RECEIVED**

MAY - 2 2011

May 2, 2011

S.C. Supreme Court

The Honorable Daniel Shearouse  
Clerk of Court  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, SC 29211

RE: The Estate of James Brown and the James Brown 2000 Irrevocable  
Trust dated August 1, 2000.

Dear Mr. Shearouse:

Enclosed for filing are the original and 15 copies of Respondents' Final Brief. Also enclosed are the Certificate of Counsel and Proof of Service.

Very truly yours,

C. H. Jones, Jr.  
Senior Assistant Attorney General

cc:  
See attached Certificate of Service

RECEIVED

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

RECEIVED

MAY -2 2011

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

S.C. Supreme Court

THE HONORABLE DOYET A. EARLY, III, CIRCUIT COURT JUDGE

Case No. 2008-CP-02-1647

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,

vs.

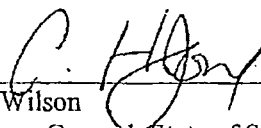
Albert H. Dallas, Alfred A. Bradley, and David G. Cannon, Individually and as (purported) Trustees of the James Brown 2000 Irrevocable Trust; Adele J. Pope and Robert L. Buchanan, Jr., Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust; Terry Brown; Romunzo Brown; Forlando Brown; Cinnamon N.M. Paris; LaRhonda Pettitt; 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,

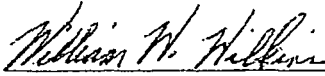
of whom Robert L. Buchanan, Jr. and Adele J. Pope, as Personal Representatives of the Estate of James Brown and Trustees of the James Brown 2000 Irrevocable Trust  
are.....Appellants,

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 Pettitt; 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 w/a/d/  
August 1, 2000.

FINAL BRIEF OF RESPONDENTS

  
Alan Wilson  
Attorney General, State of South Carolina  
C. Havird Jones, Jr.  
Senior Assistant Attorney General  
Robert D. Cook  
Assistant Deputy Attorney General  
J.C. Nicholson, III  
Assistant Attorney General  
Mary Frances Jowers  
Assistant Attorney General  
Office of the Attorney General  
State of South Carolina 29211-1549  
Post Office Box 11549  
Columbia, South Carolina 29211-1549  
(803) 734-3970

  
William W. Wilkins  
J. David Black  
Fred L. Kingsmore, Jr.  
NEXSEN PRUET, LLC  
55 East Camperdown Way (29601)  
Post Office Drawer 10648  
Greenville, South Carolina 29603-0648  
(864) 370-2211  
*Attorneys for Respondent Russell L. Bauknight, as the Court-Appointed Trustee of the James Brown 2000 Irrevocable Trust and Personal Representative for the Estate of James Brown and as the Special Administrator and Special Trustee for the Estate of James Brown and the James Brown 2000 Irrevocable Trust*

Louis D. Levenson  
LEVENSON & ASSOCIATES  
125 Broad Street  
Atlanta, Georgia 30303  
(404) 659-5000  
*Attorneys for James Brown Children and Grandchildren Daryl J. Brown, Individually*

*and on Behalf of His Minor Children,  
Lindsey Delores Brown and Janise Vanisha  
Brown; Deanna J. Brown Thomas,  
Individually and on Behalf of her Minor  
Child, Jason Brown Lewis; Yamma N.  
Brown, Individually and on Behalf of Her  
Minor Children, Sydney Lumar, Carrington  
Lumar, and Tonya Brown; Vanisha Brown;  
Larry Brown*

Robert N. Rosen  
T. Heyward Carter, Jr.  
S. Alan Medlin  
David L. Michel  
Post Office Box 1510  
Charleston, South Carolina 29402  
(843) 377-1700  
*Attorneys for Tommie Rae Hynie Brown*

Matt Bodman  
MATT BODMAN P.A.  
1500 Calhoun Street  
Columbia, South Carolina 29201  
(803) 806-8605  
*Attorney for Terry Brown*

Albert P. Shahid, Jr.  
SHAHID LAW OFFICE, LLC  
89 Broad Street  
Charleston, South Carolina 29401  
(843) 853-4500  
*Attorney for Stephen M. Slotchiver,  
Guardian ad Litem for James Brown II*

May 2, 2011

Columbia, South Carolina