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STATE OF SOUTH CAROLINA
In the Court of Appeals

SC Court of Appeals

Appeal from Richland County
Court of Common Pleas

The Honorable Doyet A. Early, III, Circuit Judge

Appellate Case No. 2016-001708

Adele J. Pope..... Appellant,

v.

Alan Wilson, in his capacity as Attorney General of South
Carolina.....Respondent.

**APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Appellant designates the following for inclusion in the Record on Appeal
herein:

Orders

1. Form 4 Order of the Hon. Doyet A. Early, III, dtd. July 27, 2016.
2. Order of the Hon. Doyet A. Early, III, dtd. June 14, 2016.
3. Form 4 Order of the Hon. Frank R. Addy, Jr., dtd. January 11, 2012.
4. Order of the Hon. Frank R. Addy, Jr., dtd. November 22, 2011.

Pleading and Motions

1. Complaint dtd. and filed August 10, 2011, w/ Exhibits A- E.
2. Plaintiff's Motion to Expedite, w/ attachment, dtd. September 1, 2011.

3. Motion of Attorney General ("AG") to Dismiss and Alternative Motion to Strike, dtd. Sept. 12, 2011, with Exhibits.
4. Plaintiff's Motion for Summary Judgment, with attachments, dtd. September 21, 2011.
5. Plaintiff's Memorandum in Support of Summary Judgment and in Opposition to Motion to Dismiss or Strike, dtd. Oct. 20, 2011.
6. Motion to Intervene, dtd. October 28, 2011.
7. Return to Motion to Intervene, dtd. November 9, 2011.
8. Plaintiff's Return and Opposition to Judgment on the Pleadings, dtd. January 11, 2013.
9. Status Report of Plaintiff, dtd. March 28, 2013
10. Plaintiff's Brief, dtd. May 2, 2016.
11. Plaintiff's Motion to Alter, Amend or Vacate Order Granting Attorney General's Motion to Dismiss, dtd. June 27, 2016.

Transcripts

1. Transcript of Hearing in FOIA matters held January 11, 2012, pp. 1, 27, 28, 24-47.
2. Transcript of Hearing held May 17, 2016, pp. 1, 2, 3, 5-9, 13-19, 24, 32-35.

Affidavits and Miscellaneous

1. *Private Foundations, Copyright Heirs and Musical Millionaires: or Why the James Brown "I Feel Good Trust" doesn't...*, draft article by Pope and Smith (4/2011)
2. Affidavit of Pope Supporting Expedited Hearing and in Camera Review of documents Sought Under FOIA, dtd. Sept. 1, 2011.
3. Affidavit of Pope, dtd. September 26, 2011.
4. Memorandum of Attorney General in Support of: Motion to Dismiss and Motions to Strike and in Opposition to Summary Judgment, dtd. October 26,

2011, w/ Attachment.

5. Affidavit Supporting Immediate Release of McMaster Contract to Sue Buchanan and Pope of Thomas R. Young, Jr., dtd. December 2011.
6. Affidavit of Appellant Opposing All Motions to Strike, dtd. October 18, 2011.
7. Affidavit of Appellant in further Support of All Relief Requested in Complaint, Expedited Hearing and *In Camera* Review, dtd. October 6, 2011, with Exhibits: A through D.
8. Memorandum of AG in Support of: Motion to dismiss and Motions to Strike and in Opposition to Summary Judgment, dtd. October 25, 2011.
9. Affidavit of Deborah W. Spence, dtd. December 7, 2011.
10. Affidavit of Thomas H. Pope III, dtd. 12/8/11.
11. Affidavit of W. Jeffrey Smith, dtd. December 9, 2011, with Exhibits A through E.
12. Affidavit of Steven Farrar, dtd. January 4, 2012.
13. Affidavit of Daryl L. Williams, dtd. January 6, 2012, with Attachment
14. Affidavit of Pope Supporting Attorney's Fees and Costs dtd. January 9, 2012.
15. Plaintiff's Brief in Opposition to Motion of AG to Consolidate Cases, dtd. March 14, 2012 w/ attachment.
16. Plaintiff's Status Report and Memorandum of Law , dated March 27, 2013, with Exhibit.
17. Ltr. of Wingate Suit counsel to the Hon. L. Casey Manning, dtd. May10, 2013.
18. Ltr. of Silvernail to Hon. L. Casey Manning, dtd. 4/21/15.
19. Ltr. of Silvernail to Hon. L. Casey Manning, dtd. 1/29/16.

Respectfully submitted,



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Counsel for Appellant

December 22, 2016

CERTIFICATE OF COUNSEL

The undersigned counsel for Appellant hereby certifies that the Designation of Matter to be Included in the Record on Appeal contains no material irrelevant to the appeal.



Adam T. Silvernail

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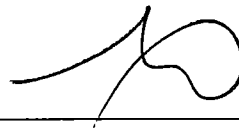
Respondent.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Appellant's Designation of Matter on Respondent by mailing a copy of same on December 22, 2106, addressed to his attorney of record as follows:

J. Emory Smith, Jr., Esquire
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211

Counsel for Respondent Attorney General



Adam T. Silvernail

Law Office of
ADAM T. SILVERNAIL
LLC

December 22, 2016

By Hand-delivery:

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Pope vs. Wilson*
Appellate Case No. 2016-001708

Dear Ms. Kitchings:

Enclosed for filing please find an original and one copy of the following:

1. Appellant's Initial Brief;
2. Appellant's Designation of Matter to be Included in the Record on Appeal; and
3. Proof of Service.

I would appreciate your filing the originals and returning the file-stamped copies to me.

I also advise you that the last transcript related to this matter was received by Appellant's counsel on November 28, 2016.

Thank you for your assistance with this matter.

Sincerely,


Adam T. Silvernail

Enclosures

cc: J. Emory Smith, Jr., Esquire
A. Camden Lewis, Esquire
Keith M. Babcock, Esquire
Ariail E. King, Esquire
Adele J. Pope, Esquire