

0048

RECEIVED

MAR 22 2018

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Doyet A. Early, III Circuit Court Judge
The Honorable L. Casey Manning, Circuit Court Judge

Case No. 2010-CP-40-4900

Appellant Case No.: 2017-001899

RUSSELL L. BAUKNIGHT, as Trustee of The James Brown 2000 Irrevocable Trust and the James Brown Legacy Trust, as Personal Representative of the Estate of James Brown, and on behalf of Alan Wilson, in his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child, Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. And Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown

And

ALAN WILSON, in his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown, Respondents.

v.

Adele J. Pope, Defendant,

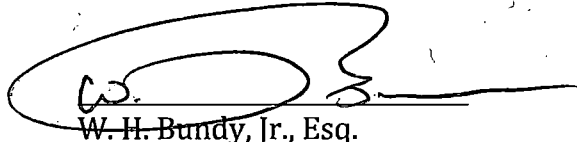
Of whom Adele J. Pope is Appellant.

Comes now the Appellant Adele J. Pope and moves the Court for the following:

- (1) On February 22, 2018 Respondent Attorney General filed a Motion to Strike Appellant's Initial Brief and Designation of Appellant ("AG Motion").
- (2) On February 23, 2018 all other Respondents filed a Motion to Strike Initial Brief and Designation of Matter of Appellant ("Respondents' Motion Adopting AG Motion") adopting the AG Motion and requesting the same relief as the AG Motion.
- (3) On March 2, 2018, Appellant filed Returns to the AG Motion and Respondent's Motion adopting the AG Motion.
- (4) On that same day, March 2, 2018, all other Respondents filed correspondence entitled "Supplement to Motion to Strike the Initial Brief and Designation of Matter of Appellant."
- (5) The SCACR do not provide for supplemental briefing for motions. Indeed, the Appellant already filed her return to the Motion.
- (6) On March 9, 2018, Respondent AG and all other Respondents' filed Reply Briefs to which no response is allowed under the SCACR.
- (7) To the extent the Court wishes to consider any of the arguments made or relief requested in the correspondence entitled "Supplement to Motion to Strike the Initial Brief and Designation of Matter of Appellant," Appellant respectfully requests this Court to grant Appellant leave to to file supplemental filings in reply to the "Supplement to Motion to Strike the Initial Brief and Designation of Matter of Appellant."

[signature page follows]

Respectfully submitted,



W. H. Bundy, Jr., Esq.
M. Brent McDonald, Esq.
Bundy McDonald, LLC
1516 Old Trolley Road, 2nd Floor
Summerville, South Carolina 29485
888-552-1559
walter@bundymcdonald.com
brent@bundymcdonald.com

and

Adam T. Silvernail
Law Office of Adam T. Silvernail, LLC
1905 Marion Street (29201)
Post Office Box 7995
Columbia, South Carolina 29202
Telephone: (803) 779-1770
adam@silvernailfirm.com

Attorneys for the Appellant

March 21, 2018

STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

MAR 22 2018

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge
The Honorable L. Casey Manning

Appellant Case No.: 2017-001899

RUSSELL L. BAUKNIGHT, as Trustee of The James Brown 2000 Irrevocable Trust and the James Brown Legacy Trust, as Personal Representative of the Estate of James Brown, and on behalf of Alan Wilson, in his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child, Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. And Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown

And

ALAN WILSON, in his capacity as Attorney General of the State of South Carolina; Tommie Rae Brown, individually and on behalf of her minor child, James B. II; Daryl J. Brown, individually and on behalf of his minor child Janise B.; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor child Sydney L. and Carrington L.; Tonya Brown; Venisha Brown; Larry Brown; and Terry Brown, Respondents.

v.

Adele J. Pope and Robert L. Buchanan, Jr., Defendants. Of

whom Adele J. Pope is Appellant

RECEIVED

MAR 22 2018

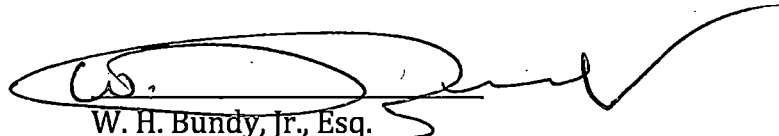
PROOF OF SERVICE

SC Court of Appeals

I certify that I have served Appellant's Motion For Leave to File Supplemental Filings by US

Mail on counsel listed below:

Kenneth B. Wingate, Esquire Mark V. Gende, Esquire Joseph O. Thickens, Esquire Sweeny, Wingate & Barrow, P.A. 1515 Lady Street Columbia, SC 29201	C. Harvid, Jones, Esquire Office of the Attorney General P.O. Box 11549 Columbia, SC 29211
--	---



W. H. Bundy, Jr., Esq.
M. Brent McDonald, Esq.
Bundy McDonald, LLC
1516 Old Trolley Road, 2nd Floor
Summerville, South Carolina 29485
888-552-1559
walter@bundymcdonald.com
brent@bundymcdonald.com

and

Adam T. Silvernail
Law Office of Adam T. Silvernail, LLC
1905 Marion Street (29201)
Post Office Box 7995
Columbia, South Carolina 29202
Telephone: (803) 779-1770
adam@silvernaillawfirm.com

Attorneys for the Appellant

3/21/18, 4:29 PM

ORIGIN ID:CHSA (888) 552-1559
KATHY WENTLAND

1516 OLD TROLLEY ROAD, 2ND FLO

SUMMERVILLE, SC 29485
UNITED STATES US

SHIP DATE: 21MAR18
ACT/WGT: 0.50 LB
CAD: 110094598/INET3980

BILL: SENDER

TO **JENNY A. KITCHINGS**
SOUTH CAROLINA COIURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

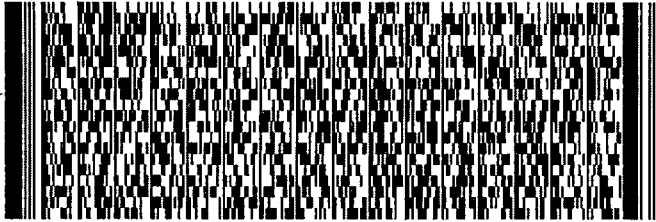
(803) 734-1890

REF: POPE

INV:
PO:

DEPT:

552J1107F5IDCA5



FedEx
Express



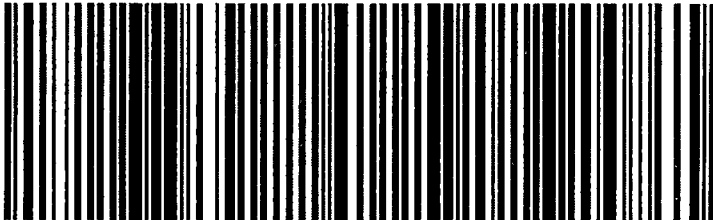
J181118012601ur

THU - 22 MAR 10:30A
PRIORITY OVERNIGHT

TRK# 7718 0290 1887
0201

28 USCA

29201
SC-US CAE



RECEIVED

MAR 22 2018

SC Court of Appeals