

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 23 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, Circuit Court Judge

Appellate 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.; Daryl J. Brown, individually and on behalf of his minor child Janise Vanisha Brown; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor children, Sydney L., Carrington L., and 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.; Daryl J. Brown, individually and on behalf of his minor child Janise Vanisha Brown; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown - Lewis; Yamma N. Brown, individually and on behalf of her minor children, Sydney L., Carrington L., And 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 the Appellant Appellant.

**DESIGNATION OF MATTER FOR THE RECORD
OF RESPONDENT ATTORNEY GENERAL**

Pursuant to Rule 209, SCACR, the Respondent Attorney General designates the

following matter for the Record on Appeal:

1. Order dated July 5, 2012, denying Motion to Disqualify.
2. Order of October 13, 2015 setting aside entry of default
3. Order of Supreme Court assigning case to Judge Early, March 24, 2016
4. Order granting Motion for Protective Order, September 21, 2016
5. Order of May 31, 2017, granting Motion to be Dropped.
6. Order filed August 7, 2017, denying Motion to Reconsider May 31, 2017 Order under Rule 59, SCRCPP
7. Order of June 23, 2017, granting Summary Judgment as to Counterclaim¹
8. Order filed August 7, 2017, denying Motion to Reconsider under Rule 59, SCRCPP
9. Answer to the Counterclaim dated November 16, 2010
10. Motion to Lift Entry of Default, November 26, 2010
11. Affidavit of Wingate, November 16, 2010
12. Memorandum in Support of Motion to Lift, April 11, 2012
13. Memorandum in Opposition to Motion to Disqualify, April 11, 2012
14. Motion of Attorney General to be Dropped as a Party – March 25, 2013 and Exhibits to Motion.
15. Notice of Special Appearance of AG, August 16, 2016, for the purpose of arguing and handling all matters related to the 2013 Motion to be Dropped and attached 2007 and 2013 Orders.
16. Motion for Protective Order as to Deposition of Attorney General – July 18, 2016

¹ Because Appellant cites her Motion to Alter or Amend the Order granting the Motion for Summary Judgment as to Appellant's counterclaim, subject to his objection to those citations, the Attorney General has designated that Order of Judge Early Granting Summary Judgment.

17. Memorandum in Support of Motion for Protective Order, August 26, 2016
18. Supplemental Memorandum re Motion to be Dropped – April 3, 2017
19. Reply to Supplemental Return to Motion to be Dropped dated April 7, 2017
20. Letter of undersigned counsel to Judge Early, May 25, 2017 – Response to Pope’s Proposed Order and Second Supplemental Return to Motion
21. Letter of undersigned counsel to Judge Early, July 26, 2017, responding to Pope’s Rule 59 Motion as to Order dropping the Attorney General
22. Transcript, August 29, 2016: Tr. p. 34, l. 17 – p. 41, l. 13; p. 47, l. 3 – p. 48, l. 19; p. 97, l. 12 – p. 108, l. 22; p. 113, l. 25 – p. 114, l. 7; p. 115, ll. 1-22.

Respectfully submitted,

ALAN WILSON
Attorney General

ROBERT D. COOK
Solicitor General
S.C. Bar No. 1373

J. EMORY SMITH, JR.
Deputy Solicitor General
S.C. Bar No. 5262

BY: 

ATTORNEYS FOR RESPONDENT
ATTORNEY GENERAL

July 23, 2018

CERTIFICATE OF COMPLIANCE WITH RULE 209(c), SCACR

I certify that the foregoing Designation contains no matter which is irrelevant to the appeal.

BY: 

J. EMORY SMITH, JR.
Deputy Solicitor General

July 23, 2018

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Trial Court Case 2010CP4004900

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..... Respondents,

v.

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Of whom Adele J. Pope is the Appellant.

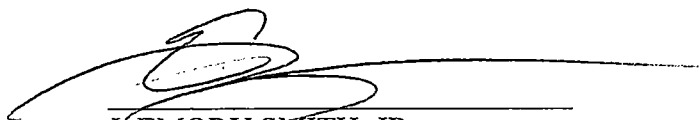
CERTIFICATE OF SERVICE

I hereby certify that I have served the Initial Brief and Designation of Matter for the upon counsel for the other parties by mailing copies to them at the addresses below via the States Mail this July 23, 2018:

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