

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

RECEIVED
AUG 13 2018
SC Court of Appeals

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 and Robert L. Buchanan, Jr. Defendants

Of whom Adele J. Pope is Appellant.

APPELLANT'S COUNTER-DESIGNATION TO RESPONDENTS

OTHER DOCUMENTS

1. Appellant Motion to Add Forlando Brown as a Party filed April 25, 2013.
2. Letter of SWB to Judge Manning dated may 10, 2013.
3. Return of Aiken 1337 Plaintiff to Joint Motion to Consolidate Discovery filed January 20, 2017.

TRANSCRIPTS

4. Transcript Hearing of January 11, 2012 in 2011-CP-36-379—now Richland 4900, p. 1; p. 26, lines 6-17; p. 31, line 12 through p. 32, line 22.

Respectfully submitted,



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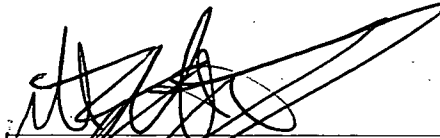
adam@silvernailfirm.com

Attorneys for the Appellant

August 13, 2018

CERTIFICATE OF COMPLIANCE WITH RULE 209(c)

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



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v.


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

Of whom Adele J. Pope is Appellant

PROOF OF SERVICE

I certify that I have served Appellant's Counter Designation To Respondents by US Mail and email on August 13, 2018 via to all 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 Emory Smith, Esquire Office of the Attorney General P.O. Box 11549 Columbia, SC 29211
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Summerville, SC

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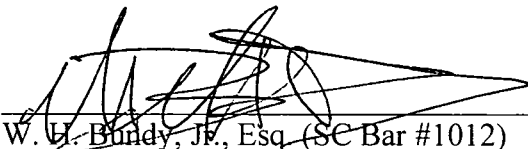
Adele J. Pope and Robert L. Buchanan, Jr., Defendants.

Of whom Adele J. Pope is Appellant

PROOF OF SERVICE

I certify that I have served Appellant's Initial Reply Brief to Respondents by US Mail and email on August 13, 2018 via to all 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 Emory Smith, Esquire Office of the Attorney General P.O. Box 11549 Columbia, SC 29211
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August 13, 2018
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TRIAL LAWYERS

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August 13, 2018

Via Hand Delivery

The Honourable Jenny Abbott Kitchings
Clerk of Court – The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Russell Bauknight, *et. al.* vs. Adele J. Pope
Appellate Case No. 2017-001899

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Dear Ms. Kitchings:

Enclosed please find (1) original and (1) copy of Appellant Adele J. Pope's Initial Reply Brief To Respondents and Appellant's Counter Designation to Respondents. Also enclosed is Proof of Service of the same upon all counsel of record.

Please file the original and return a file stamped to our courier.

I thank you for your attention to this matter, and as always, please do not hesitate to call me should you require anything further.

Sincerely,



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Attorney for Appellant

WHB/kjw

cc: *via US Mail & Email*
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