

**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**

**RECEIVED**  
**SEP 17 2018**  
**SC Court of Appeals**

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**Appellate Case No.: 2017-001899**

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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.

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**RETURN AND MEMORANDUM OPPOSING MOTION OF ATTORNEY GENERAL  
TO STRIKE AND REQUESTING EXPEDITED CONSIDERATION**

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Appellant opposes the September 5, 2018, Motion to Strike of Respondent Attorney General Alan Wilson (AG Wilson), acting through special appearance counsel. Special appearance counsel has represented AG Wilson only since 2016, and only with respect to a single phase of this pre-trial appeal of an 8-year-old case, Richland County Case 2010-CP-40-4900 (“Richland 4900”). AG Wilson’s private counsel, which represents both AG Wilson and more than fifteen additional Respondents in Richland 4900 and this appeal, did not join in the relief requested.

Since May 19, 2010 Sweeny, Wingate and Barrow, P.A. (“SWB”), a private law firm, has been sole counsel in Richland 4900 to two successive AGs as well as all other Respondents. (See Complaint, R., p. 176). By Notice of Special Appearance dated August 11, 2016, signed by Sr. Asst. Deputy AG Havird “Sonny” Jones, AG Wilson specially appeared, in addition to AG Wilson’s private counsel, for the following limited purpose:

The undersigned counsel enters this special appearance for the purpose of arguing and handling all matters related to Attorney General Alan Wilson’s Motion to be Dropped as a Party dated March 13, 2013, attached to this Notice as *Exhibit C*.

... [T]he Notice is being filed to avoid any dispute regarding who can argue and handle the Motion to be Dropped As a Party. In addition, the Motion to be Dropped as a Party is being served upon all counsel. (R, p. 862, See R., p. 791-793 for Motion to be Dropped).

Exhibit C to the Notice is a letter of former AG, now Governor, Henry McMaster to Mr. Russell Bauknight, dated May 18, 2010. (R, p. 793). The 1-paragraph letter states in relevant part:

I have met with Ken Wingate and Everett Kendall of [SWB] in Connection with the action to be filed against Adele J. Pope and Robert L. Buchanan, Jr., in Richland County...I am writing to confirm our understanding that you will be retaining Mr. Wingate and Mr. Kendall to bring this action on behalf of the beneficiaries of the James Brown Estate and Trust, including the charitable interests. As you know, by law this office has a duty to protect charitable trusts.

Also, per your conversation with [AG Jones], in connection with the charitable trust portion of this matter, you have agreed to use the terms and conditions as outlined in the Attached "Agreement for Legal Services" which references and incorporates the Attorney General's standard Litigation Retention Agreement. Of course, this office has no authority over your agreement with Messrs. Wingate and Kendall concerning the other portions of the matter. (*Emphasis supplied, R., p. 793*).

The motion of the AG's special-appearance counsel should be denied. It exceeds the limited scope of the AG's 2016 special appearance, which was solely to address matters related to the Rule 21 motion to be dropped. The issues of immunity, disqualification, and the lower court's consideration of Governor McMaster's two separate sworn admissions in 2016 that he did not authorize Richland 4900 to be brought in the name of the State/AG against Buchanan and Pope are far beyond the scope of his Rule 21 arguments. They are not being made by the AG's private counsel, who bears the burden of also representing the AG and more than 15 other Co-Plaintiffs in Richland 4900.

Even if the AG's special appearance counsel had the authority to speak on the issues raised in the Motion to Strike, special appearance counsel's objections are without merit. The portions of the Appellant's two reply briefs are appropriate; the designations are correct; and all matters were presented to the lower court, either by filing; proper reference; or proper judicial notice taken by the lower court.

Among the properly cited documents is the Special Counsel Litigation Retention Agreement between the AG and Sweeny, Wingate and Barrow, P.A., ("SWB Contract"), which has been repeatedly considered by the lower court in the consolidated Richland 4900 FOIA case since at least early 2012. Indeed, this document is referenced in Exhibit A to Respondent AG's Motion to be Dropped. (R. p. 793).

Everything Appellant has referenced or cited is appropriately responsive to new matters raised by the AG and other Respondents in the two separate briefs filed on behalf of the AG in this appeal.

Appellant respectfully requests that this Honorable Court consider expediting this appeal, including by unsealing a document sealed with no lower court review of its contents. This case was brought 8 years ago in the name of the State/AG against Appellant and Buchanan and continues to damage their careers and reputations today. The Governor says that he did not authorize this suit to be filed in the name of the AG. The current AG says he knows nothing about the suit. It is time for the AG's role in this matter to be determined by the Appellate Court.

This return is supported by the ROA, copies of which are being filed with this Court. (Additional copies will be filed with Appellant's final briefs.) It is further supported by the Memorandum which follows. The Court is also asked to take judicial notice of the ROA and briefs in Appellate Case No. 2016-001708, a 2016 appeal from the FOIA portion of Richland 4900, for a more complete understanding of the history of the SWB contract.

### **REPLY ARGUMENT**

#### **a. Special Appearance-Counsel's Motion Exceeds the Scope of his Authority**

On May 19, 2010 Governor McMaster, then AG, sued Buchanan and Pope in Richland 4900. Private attorneys, SWB, were the AG's sole attorneys of record, as well as the sole attorneys for more than a dozen additional plaintiffs. (R., p.178 - 188). Sr. Asst. AG Havird "Sonny" Jones appeared at the first hearing and was introduced by Kenneth Wingate, Esq., as ""an attorney with the Attorney General's office, one of our clients." (R., p. 1122). SWB remained the sole counsel for then-AG McMaster until he left office. As to the matters in the

complaint, including a motion for partial summary judgment, SWB remains sole counsel for AG Alan Wilson, who replaced McMaster in January 2011.

Beginning in 2011, Russell Bauknight and AG Wilson sought to have three FOIA cases transferred from other counties; consolidated with this case (Richland 4900); and subordinated to discovery in this case. (R, pp. 61-69, 2009-2010, 2202-2203) The three FOIA cases involved, among other documents, the SWB Contract; a January 2011 amendment to Respondent James Brown Legacy Trust; Bauknight's claimed \$4.7 million at-death valuation of James Brown's music empire; and certain now-public handwritten admissions of Respondent Tommie Rae Hynie Brown (Tommie Rae) that she was married, living in Texas with her husband, and possibly pregnant before leaving her husband and conducting a bigamous marriage with James Brown.

By 2012, the AG was successful in having one FOIA case seeking the Wingate Contract transferred from another county to Richland County and consolidated, but not merged, with this case-Richland 4900. (R., pp. 61-69)

In 2013, the AG told the S.C. Supreme Court and Appellant he was seeking to be dropped as a party in Richland 4900. AG Jones, not the AG's counsel of record, filed the motion and attached a letter referencing the AG's Litigation Agreement. (R, pp. 790 -793) Almost immediately after the filing, the AG's counsel of record, SWB, asked the lower court not to hear any filings in either Richland 4900, the consolidated FOIA case, or a second FOIA case involving Respondent James Brown Legacy Trust the AG was seeking to consolidate. (R, p. 1798-99). The case, at the request of the AG and others, remained at a near-standstill until 2016.

While SWB filed a motion to be relieved as counsel for the AG in 2013, it has continuously acted for the AG, and since then SWB has the motion to be relieved as counsel in 2016. (ROA, p. 854-55).

In response to the August 11, 2016 Notice of Special Appearance, the lower court allowed the AG, through AG Jones, to argue the Rule 21 dismissal motion.

At the August 29, 2016 hearing, SWB argued various discovery motions for the AG and others. (R, p. p. 1177 – 1199). AG Smith, as counsel for the AG, then argued his motion for protective order as to the deposition of AG Wilson. (R. p. 1200). The AG, through Wilson, asserted that because AG Wilson was not in office when Richland 4900 was brought “he has no personal knowledge about it.” [ R, p. 1202 - 1207] The following dialog took place:

THE COURT: Wilson is not representing – he’s not acting as a lawyer in this case, is he?

MR. SMITH: well, he is the attorney general, he is a party, and he’s also a lawyer, your Honor.

THE COURT: But he’s not counsel for Plaintiff, is he?

MR. SMITH: No, Your Honor.

THE COURT: No. [ R. p. 1203]

At that hearing, counsel for Appellant reported the deposition of Governor McMaster which had taken place the same month. He said:

Your Honor asked a really interesting question earlier, which is, is he a lawyer in this case? He’s not. This case is incredibly unusual, if not totally unique, because he’s – Mr. Wilson’s office is not on the pleadings in this case. He is represented by [SWB]. That’s – now Mr. Jones recently filed a limited notice of appearance. But for six years, Mr. Wilson is a co-plaintiff with these 15 other folks and entities. We’re entitled to examine Mr. Wilson about his relationship with these folks.

Mr. McMaster, just last week or the week before, came to his deposition and also seemed to be surprised. He didn’t believe he was a party to this case. You know, we’re entitled to find out what the

attorney general's position is on this. [R,p. 1207 – 1208].

After the above appearances, at the same hearing where discovery matters were addressed by SWB, AG Jones, speaking under his limited special appearance authority, argued the AG's Rule 21 Motion to be Dropped as a Party. [ R, p. 1217, ff] He stated, in part:

So, your Honor, when that case [*Wilson v. Dallas*] came back to you In 2013, we approached you in.....might have been the one in Barnwell, saying we understand that Mr. Bauknight's up for consideration for appointment, our office is definitely satisfied with the way he is a professional fiduciary...

AND

There's some confusion on what was the role of the AG on Mr. Bauknight's retaining the Wingate firm,... [ROA, p. 1228]

AND

We're on the caption of this case, Your Honor, the 4900 Case. And if you look at the caption, there's a reason for the way its laid out. At this time, the case was pending before the State Supreme Court. We didn't know what would happen. And, in fact, the thought was, if you look at the -- that first part , you got Mr. Bauknight representing everybody. And we're included in the complaint as the beneficiary.

And in the second part, you don't see Mr. Bauknight. And that would be from a strategy point of view. If the case was overturned and Ms. Pope and Mr. Buchanan was [sic] still in there and Mr. Bauknight was out, there's a statute of limitations of one year, she'd be suing herself. So the fault would be, the strategy part was to keep us in --- all these in the suit, if it would work that way. [ROA, p. 1222]

AND

In this case when Mr. Bauknight brought the action, Mr. Wingate's firm, they were representing our interest. They were, in effect, our lawyers.

....

Now, that may be a communication, that may be bad words, I would say, But when I deal with fee contracts --- and I've dealt in our office, for ten years, probably 20. ... All that we intended in this one and all that was included was the fee part, not anything else or control or anything else...

....

AND

So anything that goes – if it’s meritorious in the counterclaim, if you don’t drop them today, would be against the charitable beneficiaries. That’s why we’re in the case, not the AG’s office. [R, p. 1224]

The statements of special appearance counsel for AG Wilson are hard to reconcile with the clear, sworn testimony of Governor McMaster that he did not authorize Richland 4900 to be brought in the name of the AG. It is clear, however, that special appearance counsel asserts the AG does not believe it is enough of a party to be liable for the counterclaims. It is also clear that, unlike two AGs, Mr. Jones was the person planning the AG’s strategy to get into Richland 4900, and now to get out.

This appeal involves rulings spanning the entire 8-year history of Richland 4900. SWB has acted for the AG and other Respondents on all matters other than the limited Rule 21 motion for these eight years. Attempts of AG’s special appearance counsel to double team Appellant by inserting himself into evidentiary and other areas where his own private counsel, or the lower court, may not have acted in his current interest should not be permitted. The Motion to Strike should be disregarded in its entirety based on special appearance counsel’s lack of standing to argue outside the scope of his appearance.

**b. The Motion of the Attorney General’s Special-Appearence Counsel Was Untimely**

On September 5, 2017 the AG had actual knowledge that the record on appeal (ROA) was in its final stages; was being copied and bound; and would be filed in 8 days. The Motion to Strike was made at a time when changes in the ROA would result in maximum delay and cost to Appellant. Appellant respectfully requests that this factor be taken into account in its consideration of the motion.

**c. The Statements in Appellant's Reply Brief and Designations are Appropriate**

1. Preliminary Statement. Special appearance counsel objects to the statement: "Respondent AG claims it did not authorize itself to be Plaintiff in the action." The current AG asserts that this statement is "irrelevant to the issues before this Court." The statement, however, is both correct and a material element of this appeal. As the Record shows, the lower court was notified of Governor McMaster's sworn statement that he did not authorize SWB to bring this suit in the name of the State/AG immediately after it was first made in his August 2016 deposition in this case. Respondent AG cites to evidentiary rules in support of its Motion to Strike. However, the evidentiary rules cited have nothing to do with the lower court orders which are the subject of this appeal.

By oral order of the Honorable Doyet A. Early, III, SWB lawyers were allowed to attend depositions of the AG's staff in Aiken County Case 2013-CP-02- 1337 after Judge Early declined the motion of the AG and others to consolidate that case with Richland 4900. The AG's counsel and the court were kept abreast of the sworn deposition testimony of AG Jones, AG Mary Frances Jowers, former Chief Deputy John McIntosh and Solicitor General Robert Cook which did not refute Governor McMaster's testimony. In addition, Governor McMaster and AG Wilson were deposed in Aiken 1337.<sup>1</sup>

On August 26, 2016, immediately after Governor McMaster's deposition was taken, his own counsel, SWB, filed a Motion for Protective Order as to certain questions SWB directed him not to answer. (R, pp. 943 – 945). SWB said of the deposition transcript that "undersigned counsel will file it in support of this motion when it is available." Whether he actually followed

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<sup>1</sup> Aiken 1337 was tried non-jury between September 5, 2017 and July 2018. The depositions of AG Wilson, AG Jones, AG Jowers, former Chief Deputy AG McIntosh, Solicitor General Cook and others are a part of the public record in that case.

through on his commitment to file the deposition, it was treated by the parties as filed, and definitely considered by the lower court. The deposition of Governor McMaster was also extensively referenced in the filings that were before the lower court and cited in Appellant's Reply Briefs.

From 2010 until March 2013 the position taken by the Attorney General in Richland 4900 was that it was entirely appropriate for the Attorney General to be a Plaintiff with Respondents Tommie Rae, Terry Brown and others working to dismember The James Brown "I Feel Good" Trust, a charitable private foundation the Attorney General had a statutory duty to protect.

After the first (now replaced) decision in *Wilson v. Dallas* on February 27, 2013, Appellant was granted a personal interview with AG Wilson. (R., p. 2012) After the meeting, AG Wilson then called Appellant to tell her, as he told the Supreme Court, that he was getting out of Richland 4900. (R., p.2012-2013). Citing the May 18, 2010 letter of Governor McMaster to Russell Bauknight, in his Petition for Rehearing in *Wilson v. Dallas*, AG Wilson suggested to the Supreme Court that it was Bauknight, not the AG, who filed Richland 4900. (R., pp. 793,897 - 899).

Within days of the final *Wilson v. Dallas* decision of May 8, 2013, Bauknight, trustee of Respondents Legacy Trust, had been placed back in control of James Brown's assets. (R, p.176)

By August Bauknight music manager had helped Respondents James B. and Tommie Rae file Termination Notices with the U.S. Copyright office to try to take U.S. royalties from about 90 of the "I Feel Good" Charity's 900 copyrights by 2023. In addition, the AG did nothing

to require that the substantial tax damage done by the Bauknight/Afterman devaluation of the music empire to \$4.7 and Bauknight's IRS filings be corrected. (R, pp.2094- 96, 2107-2108)

Under Brown's estate plan, the "I Feel Good" Charity's "Fractional Share" of Brown's assets is tied both to the Generation-skipping exemption at his death (\$2 million) and the value of the Trust as funded after Brown's death. At \$84 million, as reported by Buchanan and Pope, the share of the grandchildren was  $2/84$  and that of the Charity was  $82/84$ .

When, after the visit with Appellant and her counsel, the AG declined to make Bauknight correct Afterman's \$4.7 million value of the music empire, this left the fraction division of Brown's assets and \$3+ million annual income at just under  $2/6$  ( $1/3$ ) for the education of 7 grandchildren and just over  $4/6$  ( $2/3$ ) for the "I Feel Good" Charity. This \$1 million or so, to the extent not needed to educate 7 grandchildren, will remain in the taxable trust until the grandchildren reach 35, paying high income tax. If the AG had required that Bauknight's IRS \$4.7 million value be corrected, and that the value Brown's be consistent with the Estate/2000 Trust's own records and expert (Roger Miller), instead of Afterman's figure, this \$1 million could today be funding scholarships. But the AG and Bauknight have continued for 5 years to claim that Bauknight's claimed \$4.7 million is correct. (R., p.2107-2108).

Special appearance counsel asks this court to make evidentiary rulings related to actions taken by the AG and his Co-Plaintiffs, as well as Buchanan and Appellant, over eight years. These matters were either acquiesced in by the AG's private counsel or not ruled on by the lower court. The AG has not appealed any evidentiary ruling, or failure to rule, by the lower court. The preliminary statement and related designations are appropriate.

2. Footnote 1: The AG seeks to have footnote 1 struck from the Appellant's Reply Brief because it does not support the sentence to which it is attached, and it cites the South Carolina Supreme Court decision in *Wilson v. Dallas*. The sentence to which it is attached relates directly to the AG's unprecedented use of the present action to attempt to prosecute a case for damages with other private citizens against Appellant Pope—a private citizen. Moreover, the citation to *Wilson v. Dallas* is entirely appropriate as it is a South Carolina Supreme Court decision and it directly relates to the AG's conduct in connection with the James Brown Estate and 2000 Trust.

3. Statement of the Case. The AG's Statement of the Case contains new matters to which a response is appropriate. Appellant's reply to that statement is not a rewriting of her own brief. It is a response to that new matter. There is no basis to strike any portion of the brief.

4. The SWB Contract. Special appearance counsel asserts that the SWB contract is not appropriate for this appeal. The attempts to suppress the SWB contract and other material documents in both the consolidated FOIA case and the main Richland 4900 discovery relate directly to this appeal, which relates to discovery matters and matters of disqualification of counsel. The AG actively participated in discovery, seeking to review more than 100 boxes of documents Appellant had been required to gather in her defense. As stated above, the SWB contract is a public document. It has been openly considered by the lower court since it was made public by a federal judge in 2013. Indeed, the SWB Contract is referenced in Exhibit A to Respondent AG's Motion to Be Dropped. (R. p. 790-793).

5. Prosecutorial Immunity. In the complaint in this action, the Attorney General and Bauknight, serving at the pleasure of the AG as trustee of Respondent Legacy Trust, accused Buchanan and Pope both of having breached their fiduciary duty by not accepting a \$100 million offer made in 2007 for James Brown's music empire and of inflating the value of the

music empire in IRS filings for the improper purposes. By 2011, Bauknight, aided by Peter Afterman, had valued Brown's music empire as of his death at \$4.7 million. Both the AG and Bauknight continue this valuation claim even as their own copyright expert Roger Miller valued the 900 copyrights alone at \$45 to \$60 million. By May 2011 the AG, Bauknight and Terry Brown—who had been part of a 2007 \$100 million offer and had been given a right of first refusal by the AG to buy Brown's music empire – were all telling the S.C. Supreme Court that Brown's music empire was worth only \$4.7 million when Brown died, and that Buchanan and Pope had overstated the value by \$79 million in IRS filing to get a \$5 million commission. It is a federal felony to make a knowing false statement on an IRS filing for personal gain.

When Buchanan and Appellant challenged the AG's used of a private law firm to sue them, the AG, Bauknight and others assured the circuit court that Richland 4900 was not a criminal or quasi-criminal matter. Nor was it even a malpractice matter. Seven years later, the AG, through special-appearance counsel, asserts that the AG is entitled to prosecutorial immunity.

It is appropriate for Appellant, in reply, to address new claims of special-appearance counsel of prosecutorial immunity. This is especially true where SWB, the AG's other, private attorney in this case, took a different position for years. The overvaluation claim (along with a false planted Grammy© story) was noted in the *Wilson v. Dallas*, and is material to this appeal. There is no basis to strike this portion of the brief.

5. Designated Items are Appropriate. On August 9, 2011, the AG, through private counsel SWB, claimed: "Fee Agreements are the epitome of privileged communications." He asked the Honorable L. Casey Manning to review the Wingate Agreement *en camera*. At

the same time, AG Jones, the client, wrote Judge Manning saying the AG was ready and more than willing to produce the Wingate Agreement.

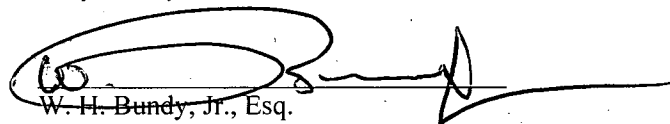
The terms of the AG's Standard Litigation Retention Agreement were known all along. The AG controls the litigation; is supposed to review all pleadings; and gets 10% of the legal fee collected. The AG's other Litigation Retention Agreements were posted on the AG's website before the Wingate Agreement was released. The SWB Contract, over Bauknight's objection was finally made public by a federal court in 2013. It has been considered by the Court and parties since.

The McMaster deposition was considered by the lower court. The responses to interrogatories are also appropriate for inclusion in the ROA as Judge Early ordered discovery in this action to begin anew. (R. p. 44). Interrogatory responses are part of discovery and the record in the case but are not required to be filed. All other documents cited were considered by the Court.

### **Conclusion**

The Motion to Strike of special appearance counsel should be disregarded because it exceeds the scope of his special appearance and is without merit. This Court should expedite this pre-trial appeal related to an eight-year-old case.

Respectfully submitted,



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*Attorneys for the Appellant Adele J. Pope*

September 17<sup>th</sup>, 2018

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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The Honorable L. Casey Manning, Circuit Court Judge

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Appellate Case No.: 2017-001899

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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

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v.

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

Of whom Adele J. Pope is Appellant.

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PROOF OF SERVICE

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I certify that I have served the Return and Memorandum Opposing Motion of Attorney General To Strike and Requesting Expedited Consideration on Respondents on September 17, 2018, addressed to their attorneys of Record as follows:

**VIA US MAIL- Certified Mail**

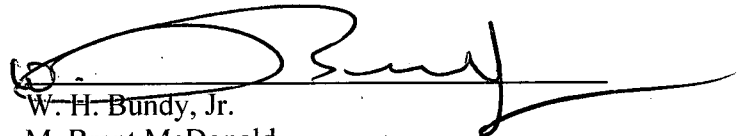
**Return Receipt Requested**

Kenneth B. Wingate, Esquire  
Mark V. Gende, Esquire  
Joseph O. Thickers, Esquire  
Sweeny, Wingate & Barrow, P.A.  
1515 Lady Street  
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**VIA US MAIL- Certified Mail**

**Return Receipt Requested**

C. Harvid, Jones, Esquire  
Emory Smith, Esquire  
Office of the Attorney General  
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September 17, 2018

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September 17, 2018

**VIA HAND-DELIVERY**

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

RECEIVED  
SEP 17 2018  
SC Court of Appeals

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

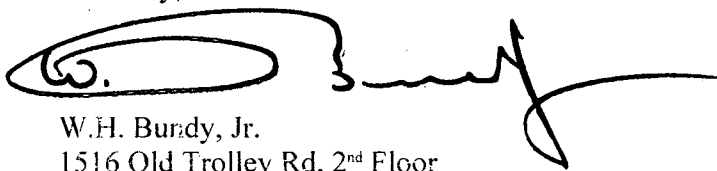
Dear Ms. Kitchings:

Enclosed please find (1) original and (6) copies of Appellant Adele J. Pope's Return and Memorandum Opposing Motion of Attorney General To Strike And Requesting Expedited Consideration and Proof of Service of same upon all counsel of record.

Please file the original and return a file stamped copy 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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(888) 552-1559  
Attorney for Appellant

WHB/kjw

cc: *via US Certified Mail- Return Receipt Requested & Email*  
Kenneth B. Wingate, Esquire  
Mark V. Gende, Esquire  
C. Harvid Jones, Esquire  
Emory Smith, Esquire