

THE 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

Appellate Case No. 2017-001899

RECEIVED
OCT 15 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,

Of whom Adele J. Pope is the Appellant.

**REPLY OF RESPONDENTS TO APPELLANT'S RETURN TO MOTION
TO CORRECT RECORD AND MOTION TO CONSOLIDATE APPEALS**

Respondents adopt and incorporate into this Reply by reference all filings in this appeal of the Respondents and the South Carolina Attorney General. Yet again, Appellant has filed another document and failed to properly address the four defined issues on appeal. Appellant's Return to Motion to Correct Record and Motion to Consolidate Appeals ("Appellant's Return") is part of her ongoing attempt to confuse the Respondents and this Court. Appellant's Return is surely not the last of her arguments to prolong this appeal and case. Appellant's Return is insufficient as a response to the Motion of Attorney General to Correct Record on Appeal. Appellant's purported motion to consolidate appeals is a shameless red herring, is procedurally improper, and appears only to have been presented for the purpose of delay. Respondents respectfully request that Appellant's motion to consolidate appeals be stricken or denied and that her appeal be dismissed.

Respectfully submitted,

October 15, 2018


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v.

Adele J. Pope, Defendant,

Of whom Adele J. Pope is the Appellant.

PROOF OF SERVICE

I certify that I have served the Reply of Respondents to Appellant's Return to Motion to Correct Record and Motion to Consolidate Appeals by depositing a copy of it in the United States Mail, postage prepaid, on October 15, 2018, addressed to the following attorneys of record:

W.H. Bundy, Jr., Esquire
Brent McDonald, Esquire
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and

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P. O. Box 7995
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Attorneys for Appellant

The Honorable Alan Wilson
Attorney General

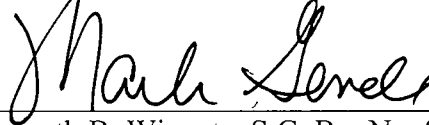
and

The Honorable Robert D. Cook
Solicitor General

and

The Honorable J. Emory Smith, Jr.
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October 15, 2018



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October 15, 2018

Reply to: Main Office

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VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
OCT 15 2018
SC Court of Appeals

RE: Russell L. Bauknight, et al. v. Adele J. Pope
Appellate Case No. 2017-001899
Civil Action No. 2010-CP-40-04900
Our File: 4077-7389

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the following in the above-referenced matter:

1. Reply of Respondents to Appellant's Return and Memorandum Opposing Motion to Strike Appellant's Initial Reply Brief to Respondent's Initial Brief
2. Reply of Respondents to Appellant's Return to Motion to Correct Record and Motion to Consolidate Appeals

Also enclosed are an original and two (2) copies of a separate, corresponding Proof of Service for each document herein being filed. I would appreciate your filing the originals and returning clocked copies to my courier. Should you have any questions or concerns, please do not hesitate to give me a call.

Very truly yours,

SWEENY, WINGATE & BARROW, P.A.


Mark V. Gende

Enclosures

cc: Counsel of Record (with copy of enclosures; via US Mail)