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**STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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**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**

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**Case No. 2010-CP-40-4900**

**DEC 17 2018**

**Appellate Case No. 2017-001899**

**SC Court of Appeals**

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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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**SUPPLEMENTAL NOTICE OF APPEAL**

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Adele J. Pope appeals the following Orders issued in this action.

1. ORDER DENYING DEFENDANT/COUNTERCLAIM PLAINTIFF'S MOTION TO ALTER, AMEND, RECONSIDER AND/OR VACATE ORDER GRANTING PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT of the Honorable Doyet A. Early, III, signed November 25, 2018, and electronically filed and received by Appellant on November 26, 2018, attached hereto as Exhibit A.

2. ORDER GRANTING PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AS TO DEFENDANT'S COUNTERCLAIMS of the Honorable Doyet A. Early, III, dated June 23, 2017, filed July 8, 2017 and received by Appellant on or before July 18, 2017, attached hereto as Exhibit B.

3. ORDER DENYING DEFENDANT'S MOTION TO LIFT STAY WHILE ON APPEAL of the Honorable Doyet A. Early, III, dated December 6, 2017, filed December 8, 2017, and received by Appellant on or before December 18, 2017, attached hereto as Exhibit C.

4. FORM 4 ORDER of the Honorable Doyet A. Early, III, dated July 15, 2016, filed July 20, 2016, and received by Appellant on or before July 30, 2016 (Denying Motion to Consolidate this case [Richland 4900] with Aiken County Case 2013-CP-02-1337 [Aiken 1337]), attached hereto as Exhibit D.

5. ORDER of the Honorable Doyet A. Early, III, dated June 6, 2017, filed June 8, 2017 and received by Appellant on or before June 18, 2017 (Related to Depositions of Kenneth B. Wingate, Esq. and Everett A. Kendall, Esq., Richland 4900 and Aiken 1337), attached hereto as Exhibit E.

6. ORDER REGARDING MOTION FOR PROTECTIVE ORDER AS TO TOMMIE RAE BROWN'S DEPOSITION of the Honorable Doyet A. Early, III, dated March 9, 2017, filed March 21, 2017 and received by Appellant on or before March 31, 2017, attached hereto as Exhibit F.

7. ORDER CONCERNING PLAINTIFFS' MOTION TO STRIKE A JANUARY 17, 2017 AFFIDAVIT OF DEFENDANT of the Honorable Doyet A. Early, III, dated March 9, 2017, filed March 15, 2017, and received by Appellant on or before March 25, 2017, attached hereto as Exhibit G.

8. ORDER COMPELLING DEFENDANT'S PRODUCTION OF DOCUMENTS of the Honorable Doyet A. Early, III, dated March 7, 2017, filed March 13, 2017 and received by Appellant on or before

March 23, 2017, attached hereto as Exhibit H.

9. ORDER GRANTING MOTION TO STAY of the Honorable L. Casey Manning, dated and filed March 2, 2016, and received by Appellant on or before March 12, 2016, attached hereto as Exhibit I.

10. ORDER DENYING MOTION TO CONSOLIDATE DEPOSITIONS OF EXPERTS of the Honorable Doyet A. Early, III, dated February 6, 2017, filed February 13, 2017 (Richland 4900 and Aiken 1337), and received by Appellant on or before February 23, 2017, attached hereto as Exhibit J.

11. ORDER GRANTING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER CONCERNING DEPOSITION OF LARRY BROWN of the Honorable Doyet A. Early, III, dated January 23, 2017, filed February 1, 2017, and received by Appellant on or before February 11, 2017, attached hereto as Exhibit K.

12. SECOND AMENDED CONFIDENTIALITY ORDER of the Honorable Doyet A. Early, III, dated January 24, 2017, filed February 1, 2017, and received by Appellant on or before February 11, 2017, attached hereto as Exhibit L.

13. ORDER GRANTING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER CONCERNING DEPOSITION OF LARRY BROWN of the Honorable Doyet A. Early, III, dated December 27, 2016, filed January 5, 2017, and received by Appellant on or before January 15 2017, attached hereto as Exhibit M.

14. ORDER of the Honorable Doyet A. Early, III, dated November 22, 2016, filed November 30, 2016, and received by Appellant on or before December 10, 2016, (Denying Rule 59 Motion) attached hereto as Exhibit N.

15. ORDER GRANTING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AS TO DARYL J. BROWN AND TONYA BROWN of the Honorable Doyet A. Early, III, dated September 21, 2016, filed September 27, 2016, and received by Appellant on or before October 7, 2016, attached hereto as Exhibit O.

16. ORDER DENYING DEFENDANT'S MOTION FOR SANCTIONS of the Honorable Doyet A. Early, III, dated September 13, 2016, filed September 20, 2016, and received by Appellant on or before September 30, 2016, attached hereto as Exhibit P

17. PROPOSED (sic) SCHEDULING ORDER of the Honorable Doyet A. Early, III, dated July 25, 2016, filed August 5, 2016, and received by Appellant on or before August 15, 2016, attached hereto as Exhibit Q.

18. ORDER CONCERNING PLAINTIFFS' MOTION FOR EXCEPTION TO THE PHYSICAL PRESENCE RULE AT MEDIATION of the Honorable L. Casey Manning, dated and filed October 13, 2015, and received by Appellant on or before October 22, 2015, attached hereto as Exhibit S.

19. ORDER LIFTING THE STAY, of the Honorable Doyet A. Early, III, dated April 8, 2016, filed April 13, 2016, and received by Appellant on or before April 23, 2016, attached hereto as Exhibit T.

20. ORDER CONCERNING PLAINTIFFS' MOTION FOR EXCEPTION TO THE PHYSICAL PRESENCE RULE AT MEDIATION of the Honorable L. Casey Manning, dated and filed October 5, 2012, and received by Appellant on or before October 12, 2015, attached hereto as Exhibit U.

21. ORDER OF DISMISSAL of the Honorable L. Casey Manning, dated and filed July 13, 2012, received by Appellant on or before July 23, 2012, attached hereto as Exhibit V.

22. ORDER CONCERNING PLAINTIFF'S MOTION FOR CONTINUANCE of the Honorable L. Casey Manning, dated and filed July 5, 2012, attached hereto as Exhibit W.

23. ORDER of the Honorable L. Casey Manning, dated January 7, 2011, filed January 12, 2011, and received by Appellant on or before January 22, 2011 (Denying Rule 59 motions related to Orders denying Motion to Dismiss and Motion to Change Venue), attached hereto as Exhibit X.

24. ORDER DENYING DEFENDANTS' MOTION TO CHANGE VENUE of the Honorable L. Casey Manning, dated November 8, 2010, filed November 9, 2010, and received by Appellant on or before November 19, 2010, attached hereto as Exhibit Y.

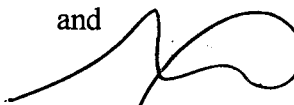
25. ORDER DENYING MOTION TO DISMISS of the Honorable L. Casey Manning, dated November 8, 2010, filed November 9, 2010, and received by Appellant on or before November 19, 2010, attached hereto to as Exhibit Z.

[Signatures on Following Page]

Respectfully submitted,

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and



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*Attorneys for the Appellant*

December 17, 2018

Other Counsel of Record:

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*Counsel for Respondents*

J. Emory Smith, Jr., Esquire  
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*Counsel for Respondent Attorney General*

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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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**PROOF OF SERVICE**

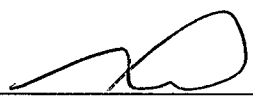
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I certify that on December 17, 2018, I have served the SUPPLEMENTAL NOTICE OF APPEAL by hand delivery on counsel listed below:

<p>Kenneth B. Wingate, Esquire Mark V. Gende, Esquire Joseph O. Thickens, Esquire Sweeny, Wingate &amp; Barrow, P.A. 1515 Lady Street Columbia, SC 29201</p>	<p>The Honorable Alan Wilson Attorney General</p> <p>Robert D. Cook, Esquire Solicitor General</p> <p>J. Emory Smith, Jr., Esquire Office of the Attorney General 1000 Assembly Street Columbia, South Carolina 29201</p>
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