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SC Court of Appeals

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

Appellate Case No.: 2018-002229

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 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.; 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.

**APPELLANT’S SUPPLEMENTAL DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Appellant submits the Counter-Designations in response to the Brief of the Attorney General. Because some designations by Appellant were originally listed as part of another designation, but will appear in the record on appeal (ROA) with a different title, Appellant also includes certain of those documents to avoid confusion or delay. Some or all of the items printed

in **bold** are believed to be the only new designations, but all are counter-designated out of an abundance of caution.

I. Orders

Order of Jg. Early dtd. 2/20, 2008 re: Tommie Rae diaries

Order of Jg. Early, dtd. 7/23/08 [Approving Education Payments]

Order, Hon. Roger Couch, dtd. 9/22/09 State of S.C. vs. Eli Lilly

Order of Jg. Addy, dtd. 1/11/2012 [Transf.Venue of Nby. FOIA 11-364 to Richland]

Order of Jg. Early Withdrawing Attorney General, Various Cases, Oct.30, 2013

Order of the Hon. William O. Bertelsman, dtd. 3/28/14 Case 3:08-cv-00014-WOB

Order of Jg. Early & Jg. Manning, filed 1/20/15 [Joint Mediation]

Order of Supreme Court dtd. April 20, 2015, In Re: Estate of Brown

Order of Supreme Court dtd. June 10, 2015, In Re: Estate of Brown

Form 4 Order of Jg. Manning, 2/9/2016 [Continued Under Advisement]

Order of the Honorable Donald W. Beatty, dtd. 3/24/16 [Aiken 1337]

Order of Jg. Early, dtd. 6/14/16 (3) Dismiss FOIA Suits

Form 4 Orders of Jg. Early (2) dtd. 7/26/16 [Deny FOIA Reconsid]

Order of Jg. Early, dtd. 9/13/16 Denying Defendant's Mot. for Sanctions

Order of Jg. Early, dtd. 11/22/16 [Deny 59 Motion]

**Order of Jg. Early, dtd. 12/27/16 Granting Plaintiffs' Motion for Protective Order
Concerning Deposition of Larry Brown**

Order of Jg. Early, dtd. 1/24/17 [Second Amended Confidentiality Order]

Order of the Hon. Jean H. Toal, 3/1/2107

II. Pleadings and Motions

Defendant's Rule 59, etc. Motion (Denying Motion to Change Venue), Nov. 19, 2010

Motion to Stay Proceedings, dtd. Nov. 30, 2010

Initial Brief of Appellant (Buchanan/Pope) *Wilson v. Dallas*

Return and Opposition of Pope to Mot. for Protective Order (Terry Brown), 6/2/11

Bauknight's Responses to Second Set of Requests for Production, dtd. June 24, 2011

Motion of Proposed Intervenors for Sanction, FOIA Case 2011-CP-36-379

Offer of Judgment of Pope to Estate of James Brown, dtd. August 2, 2012

Offer of Judgment of Pope to Tonya Brown, dtd. July 26, 2012

Exhibits to Plaintiffs' Mot. for Direction Concerning Potential Prejudicial Trial Publicity:

Exhibit List

Ex. 1: High S.C. Court to take up James Brown settlement

Ex. 5: S.C. Supreme Court hears James Brown estate feud

Ex. 6: Arguments begin in James Brown settlement case

Ex. 11: AG asked to turn over James Brown documents (SC)

Ex. 17: Dead or alive – James Brown...threats to property rights thrive

Ex. 20: James Brown Charitable trust Fate Marinating in Confusion
 Ex. 25 Deposition of Deanna Brown Thomas, Oct. 31, 2007
 Ex. 31: Goliath's Road in James Brown FOIA Suit
 Ex. 32: Motion for Sanctions , FOIA Case 2011-CP-36-00379
 Plaintiff's Return and Opposition to Motion to Intervene, FOIA 11-36-00379
 Affidavit (Pope) Oppo. Mot. to Intervene and for other relief, 11-36/00379, 11/7/11
 Ltr. of Silvernail to Smith, re: Pope v. Wilson FOIA case, Dec. 9, 2011
 Ex. 33: Mot. of Attorney General to Strike/Exclude Aff. of Wm. J. Smith
 Ex. 49: Fmr. J. Brown Trustee fights "Career-Threatening" Allegations
 Ex. 55: James Brown's Estate and Wishes Remain in Limbo
 Ltr., Pope to AG Wilson, 5/12/12 re: Release of T.R. diaries & \$4.7 million docs w/
 enclosures
 Ltr. of Pope to AG Wilson dtd. May 11, 2012, re: \$4.7 million value
 Ltr. of Chief Deputy AG McIntosh dtd. May 1, 2012 to Pope
 Email of Pope to Rosen, dtd. May 12, 2012 re: Service of subpoena
 Ex. 47: Summer FOIA Request to Attorney General, June 10, 2012
 Ex. 48: AG Wilson Asks Judge to Conceal Diaries..., June 9, 2012
 Ex. 62: AG's Promise to Release Contract May Resolve...FOIA Case, 9/21/11
 Ex. 63: AG Still Refuses to Release Docs in Newberry FOIA Case, 9/29/11
 Ex. 65: Wingate Firm, Jas. Brown Children, ask to Join AG Wilson...11/2/11
 Ex. 70: Brown's Grandson Fires Lawyers in Trust Lawsuit, 12/9/11
 Ex. 71: James Brown Estate Planning in his own Words, 12/13/11
 Ex. 72: AG ..Attempts to Exclude Affid. Of Copyright Expert...FOIA, 1/5/12
 Ex. 75: Attys. for,,... Companion Subpoena info about "explosive" diaries
 James Brown Son Claims Son/Grandson conspired with Companion, 5/25/12
 Ex. 77: Fmr. Jas. Brown Trustee fights "career-threatening" allegations, 6/17/12
 Ex. 78: Las Vegas man claims James Brown was his father, 6/19/12
 Ex. 79: son Regrets Contesting Will, .Fathers Wishes s/d be followed, 7/5/12
 Ex. 80: At Request of AG, Judge Keeps Gag Order on Diary, 7/16/12
 Ex. 81: AG Wilson & companion stop depos, but not bombshell, July 26, 2012
 Ex. 82: Jas. Brown's son pleads "protect the needy children"... Aug. 6, 2012
 Ex. 83: Court Hears Argument, Finger Pointing....Hearing on Restitution, 8/4/12
 Ex. 84: Fmr. Brown Trustee Appeals Gag Orders, 8/21/12
 Ex. 87: Rolling Stone: Year After Death, Battle...James Brown...rages on, 8/4/11
 Ex. 88: AG Wilson Brings Fight....Newberry lawsuit to Richland, 3/13/12
 Ex. 95: Will, Trusts & Est. Prof., Brown....Contest Continues, 11/1/11
 Ex. 98: W,T & E Prof., Continued Dispute over ...Brown Estate, 8/20/12
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Motion to Enforce Settlement Agreement, May 18, 2012.

Report (Pope) Required by Order of July 5, 2012, Aug. 6, 2012
Return (Pope) to Motion for Direction from Court... Trial Publicity, Aug. 28, 2012
Plaintiff's Mot. to Strike Additional Affidavits of Defendant Pope, Sept. 12, 2012
Objection to Motion of Plaintiffs to Avoid Physical Presence at Mediation, etc., 11/3/12
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Proof of ADR, dtd. October 19, 2012
Plaintiffs' Motion to Strike Affidavit of Pope dtd. 12/11/2012, Dec. 18, 2012
Motion for Judgment on the Pleading (FOIA), Dec. 20, 2012
Attorney General Alan Wilson's Mot. to be Dropped, March 25, 2013
Motion for Summary Judgment (Pope) as to James Brown Legacy Trust & Trustee, 3/22/13.
Ret. & Opp. (Pope) to Request for Stay & Request for Expedited Hearing, etc., 3/29/13
w/ Ex. A: Ltr. of Gende to Judge Manning dtd. March 27, 2013
Status Report of Defendant Pope, dtd. March 25, 2013 w/ proposed scheduling order
Return of Defendant Pope to Motion of AG to be Dropped as Party, July 2, 201[3]
Motion (Sweeny, Wingate, Barrow, PA) to be Relieved as Counsel, AG Only, 5/10/13
Notice of Appearance, Donsbach for Terry Brown, dtd., Nov. 26, 2014
Plaintiffs' Motion to Strike Affidavit of Pope dtd. Feb. 19, 2016, dtd. 2/26/16
w/ Ex. A: Affidavit (Pope) Opposing Motion for Prot. Order (Richardson Depos.)
Motion to Quash and Mot. for Prot. Order (subpoenas to Jowers, Jones, McIntosh), 4/8/16....
Return & Memo. Opposing Motion to Quash Subpoenas, Jowers, etc., dtd. 4/9/16
w/ Ex. A Email Chain Smith/ Pope, dtd. 4/9/16
Ex. B: U.S. Copyright Office, Termination Notices, Tommie. Rae, James II,
served 8/26-29/13, recorded, Copyright Office, 8/28 - 8/31/15
Mot. (Richland 4900 Plaintiffs) to Consolidate w/ Aiken 1337 for discovery, 4/11/16
Mot. to Postpone Deposition of Tommie Rae, dtd. April 25, 2016
Plaintiffs' Reply to Defendants' May 2, 2016 Memorandum, dtd. May 16, 2016
Motion of Plaintiffs as to all Counterclaims of Defendant Pope, dtd. May 17, 2016
Response to Plaintiffs' Brief, (FOIA) May 16, 2016
FOIA Pl's. Ret. & Opp. to Motion of SWB to Consolidate, dtd. June 6, 2016
Motion for Protective Order (Tommie Rae), June 22, 2016
Plaintiffs' Mot. to Alter, Etc., Attorney General Mot. to Dismiss (FOIA), July 1, 2016
Motion for Protective Order as to Deposition of the Attorney General, dtd. July 18, 2016
w/ Second Amended Notice of Deposition, 6/23/16
Mot. for Protective Order (to Quash Depos. of Tommie Rae), dtd. 7/28/16
Aiken 1337 Plaintiff.s Ret. to Mot. of Def's. for Prot. Order (Sojourner Depos.), 8/1/16
Notice of Special Appearance & Mot. to be Dropped as Party (Attorney General), 8/11/16
w/ Ex. A: Order Granting Mot. to Intervene of Behalf of AG, dtd. 10/4/07
Ex. B: Order Withdrawing Attorney General, dtd. Oct. 30, 2013, Various Cases
Ex. C: See AG's March 2013 Motion to be Dropped
AG's Petition for Rehearing, *Wilson v. Dallas*

Motion to Supplement the Record on Appeal, *Wilson v. Dallas*

w/ Ex.A: Transcript of Hearing September 28, 2008

Other Attachments to AG's Motion:

Transcript of Hearing, November 25, 2008

Transcript of Hearing, January 30, 2009

Complaint, Estate/2000 Trust vs. Cannon, Dallas, etc., 2/8/08

**Ex. G, Calculation of Potential Costs, Proposed Refinancing Transaction
Portion, Accounting, Interim #1A, May 20, 2009**

Pope's Motion to Compel, (Interrogatory Verifications, etc) dtd. August 11, 2016

Motion for Protective Order (Deposition, Venisha Brown), Aug. 11, 2016

Mot. for Prot. Order (Deposition of Lt. Gov. McMaster), Aug. 25, 2016

Mot. for Confidentiality Order, dtd., Nov. 22, 2016

Return of Aiken 1337 Plaintiff to Joint Motion to Consolidate Expert Discov., 1/17/17

Mot. for Protective Order (Deposition of Deanna Brown-Thomas), March 3, 2017

Reply to Supp. Return to AG's Motion to be Dropped as Party, April 7, 2017

Pope Response to Mot. of Pl. Tommie Rae for Protective Order, 12/30/2016

Plaintiffs' Mot. to Strike Affidavit of Pope, dtd. Jan. 23, 2017

Deposition Privilege Log of Kendall, w/ Deposition of Kendall (condensed), March 6, 2017

Deposition Privilege Log of Wingate, w/Deposition of Wingate, March 6, 2017

Rule 59, etc. Motion of Pope, Tommie Rae protective order, 3/24/17

Supp. Memorandum in Support of Motion of AG to be Dropped as Party, 4/3/17

Ret. And Opposition of Tommie Rae to Rule 59 Motion, dtd. 4/20/17

**Mot. of Defendant to Alter, Amend, Etc., Order re: Kendall/Wingate Depos, 6/16/17
w/ Protective Order, Wingate & Kendall, June 6, 2017**

Mot. Protective Order, Tiffany Provence, June 15, 2017

Mot. for Protective Order, Jason Brown-Lewis, June 26, 2017

Am. Mot. for Protective Order, Provence, dtd. June 28, 2017

Plaintiffs' Mot. to Strike, dtd. August 7, 2017

Memorandum of Law in Opposition to Motion to Lift Stay, dtd. Nov. 10, 2017

Notice of Filing of Original Depos. Transcripts, Oct. 19, 2017

Ret. And Opposition to Motion to Strike Memorandum and Smith Opinion, dtd.10.19/17

III. Hearings and Transcripts

Transcript of Hearing, December 21, 2007

Transcript of Hearing, September 28, 2008

Transcript of Hearing, January 11, 2012

Transcript of Hearing, March 31, 2014

Transcript of Hearing, May 17, 2016

IV. Exhibits and Other Documents

Certificate of Trust, James Brown 2000 Trust, filed August 7, 2001

Durable Power of Attorney, James Brown, to Deanna & others filed 2/25/01

Consent Order of Dismissal, Brown vs. Hynie Ahmed Brown, 2004
Meeting of Trustees, 2000 Trust, Dec. 27, 2006
Minutes of Trustees, 2000 Trust, January 3, 2007
Affidavit of Daryl J. Brown, dtd. January 24, 2007
Pinnacle Media and Entertainment, LLC, \$200 Million Prospectus, 2007
Email chain, Deanna Brown Thomas, Louis Levenson, Esq., March 7-15, 2007
Grahm Windsor Group, Terry Cox PhD., Developing the James Brown Legacy, 2007
Ltr. Powell Goldstein to Dallas, July 10, 2007, re: Change of Situs of 2000 Trust
w/ proposed Declaration to Change Situs
Supplement Order Related to Disbursement of Realty Proceeds, August 19, 2007
Ltr. of TJBL to Dallas/Bradley, dtd. October 12, 2007
Email Yount to AGS Jones, others, Nov. 10, 2007 re: \$18 Million Wm. Morris Revenues
Return and Recommendation of Special Administrators, Nov. 14, 2007
Inventory & Appraisalment, Est. of James Brown, Nov. 15, 2007
Ltr. of Pope to Phil Farr, CPA, dtd. June 15, 2007, w/ handwritten notations
Email Wm. Hammond to Pope/Buchanan, cc: Babcock, dtd. 6/15/07
Ltr. Lewis & Babcock to Dallas/Bradley, Nov. 16, 2007 re; possible resignations
Email Sonny Jones to Buchanan/Pope, cc others dtd. Nov. 21, 2007
Ltr. Pope to Sonny Jones dtd. Nov. 21, 2007
Affidavit Wm. Hammond, dtd. Nov. 30, 2007
Email Sonny Jones to Buchanan/Pope, etc. 12/6/07, re: attached \$100 Million Offer
Pet. to Set Aside Trust, Tommie Rae, December 19, 2007
Complaint, Forlando Brown vs. Buchanan/Pope, Trustees of 2000 Trust, Jan. 2, 2008
Excerpts, Affidavit Pope, January 6, 2008, re: challenges to service
Order Directing Payment of Fees and Costs, January 8, 2008
Email, AG Mary Fr. Jowers to Buchanan/Pope, others, Feb. 13, 2008 re: Christie's sale
Email Cox to Buchanan/Pope w/ copies to AG Jones, others, dtd. 2/29/08
w/ TJBL Ltr. of Intent to Purchase, between \$90 and \$100 Million, etc
Ltr. Buchanan/Pope to Attorney General McMaster, March 10, 2008
Application, Hardship Extension of File/Pay Estate Tax Return, James Brown, 3/24/08
Ltr. of TJBL on behalf of Terry Brown (TPP purchase, \$2 million), dtd. 3/27/08
Email from Forlando Brown to Buchanan/Pope, dtd. April 3, 2008
Order Denying Mot. to Reconsider Appt. Buchanan/Pope, April 8, 2008,
Ltr. Wayne Byrd to Levenson, w/ copy to Jg. Early, May 1, 2008
First Semi-Annual Report of PR/Trustee to Devisees, AG, etc, May 20, 2008
Ltr. Estate (Buchanan/Pope) to AG McMaster, dtd., June 13, 2008
Ltr. of AG Jones to Wayne Byrd, dtd.6/26/08 re: Emerg.Pet. for Appt. for Sp. Trustee
Ltr. of AG Jones to Jg. Early, July 7, 2008, re: recommendations for Sp. Trustee
Ltr. Estate (Buchanan/Pope) to AG McMaster dtd. June 27, 2008
Ltr. Estate (Buchanan/Pope) to AG McMaster, AG Jones, July 25, 2008

Ltr. Attorney General to Buchanan/Pope, July 30, 2008 re: approval as trustees
 Email chain, Rosen, etc., 7/31- 8/1/08 re: DNA order, Cox meeting
 Email Sonny Jones to Judge Early, others, dtd/ 8/12/08, re: Settlement of 8/10/08
 Email of Rosen to Pope, others, 8/12/2008, Re: settlement, request to “stop all work”
 Ltr. from Estate/2000 Trust (Buchanan/Pope) to AG McMaster, others, 9/2/08
 Excerpts, Depos. of Forlando Brown, 9/27/08, Federal Suit
 U.S. Estate Tax Return, Schedule F, Est. of James Brown, Sept. 24, 2008
 Ltr. Estate (Buchanan/Pope) to AG McMaster, etc.,dtd. 10/20/08 re: royalty, image, etc
 Amended Petition for Removal Restraint, Nov. 7, 2008
 Email Chain Medlin, Buchanan, etc. dtd. 2/18 – 2/19/09
 Petition of James Brown II for Review of Compensation
 Ltr. from IRS (Goodlett) to Buchanan/Pope dtd. March 24, 2009
 Ltr. of Estate/2000 Trust (Buchanan/Pope) to AG McMaster, 4/10/09 re: Corbis Contract
 Email Chain, Hayes to Jg. Early, others, 5/14 – 5/15/09, Subject: Corbis Hearing
 Interim Accounting #1, Nov. 20, 2007 – May 20, 2009
 Final Accounting (Reserving Rights), May 21 -27, 2009
 Ltr. Buchanan/Pope to Bauknight, June 22, 2009
 Custody Receipt of Bauknight, June 22, 2009
 Memorandum to Bauknight from Buchanan/Pope, July 14, 2009
 Supp. Affid. of Buchanan/Pope in Support of Commissions, July 13, 2009
 Email of Medlin to AG Jones, others, dtd. Aug. 30, 2009, re: Tax Valuation
 Indictment, David G. Cannon, February 2010
 Order for Release of Info. Related to Attys’ Fees & Other Comp, 3/15/2010
 Motion for Judgment for Costs (against Cannon), May 3, 2010
Certificate of Service, May 24, 2010 (Buchanan)
 First Request to Admit to Plaintiffs, Aug. 12, 2010
Affidavit of Beth Bauknight, dtd. October 1, 2010
 Email of Kendall to Watson, others, dtd. Nov. 12, 2010
 Plaintiffs’ Responses to First Request to Admit of Plaintiff Pope, dtd. 9/23/10
 Ltr. of Williams to Kendall, dtd. Nov. 8, 2010, re: Rule 11 as to Responses
 Initial Brief of Appellants, *Wilson v. Dallas* October 22, 2010.
 w/ Chart 1 – James Brown’s Intentions in Last Will & Trust
 Chart 3- How the Proposed Settlement Destroys/Ignores James Brown’s Intentions
 Affidavit of Williams, dtd. November 30, 2010
Response of Pope to First Request for Production of Documents, Nov.16, 2010
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Affidavit of Pope Supporting Disqualification, Injunction & Related Relief, May 18, 2011
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 Ex.C: Ltr., Black to Pope, July 15, 2011, Re; Requests for Docs under FOIA
 Affidavit of Pope Supporting Production of Legacy Trust, Contract w/AG, etc.,Aug.1,’11

Ex.A: Ltr. Pope to Attorney General Wilson dtd. March 5, 2012
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 Ltr. Pope to Attorney General, Cannnon, Bauknight, others, dtd. March 30, 2012
 Ex. B: Ltr. Pope to AG Wilson, Chief Dep. McIntosh, April 1, 2012
 Ltr. of Silvernail to Jg. Manning, July 11, 2012
 Ltr. Pope to Wilson, Sojourner, Bauknight, dtd. April 3, 2014 re: Settlement Proposal
 Ltr. of Pope to Potter dtd., June 26, 2014
Affid. of Pope Opposing Mot. of AG, Others to Stay, and Supp. Summ. Jmt., etc, 4/29/14
Notice of Appearance, Donsbach, dtd. Nov. 26, 2014
Response to Judge Early's Status Report of Daryl Brown, et al. dtd. May 13, 2015
Response of Judge Early's Status Report of Terry Brown, filed May 15, 2015
Affidavit Supporting Sum. Jmt, Damages, Offset, Transfer Termination Rights, 5/28/15
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w/ Exhibit B: S.C. attorney general sued in James Brown case
 Emails F. Brown to Kenily, to Jg. Early, Sept. 27, 2013 (Re: Tommie Rae Terminations)
Ltr. to Pope to Attorney General and others, dtd. April 3, 2014
Affidavit of Pope (Support Mot. Alter/Amend), dtd Aug. 7, 2016
w/ Ex.A: Depos. Bauknight, August 20, 2013
Affidavit Pope (Support Depos. of AGs Jowers, Jones, McIntosh),April 19, 2016
 Affidavit of Pope (Support Mot. Compel Lindsey Deposition Attendance), Aug. 22, 2016
 w/ Schedule of Documents A – T
 Ex. M: Ltr. Buchanan/Pope, AG McMaster, June 13, 2008 (re: Est Plan of J. Brn.)
 Ex. O: Ltr. Buchanan/Pope (Fax) to AG McMaster, March 16, 2009 (Beech Island)
 Ex. P: Fax Ltr. to Klett from Buchanan/Pope, 6/24/09, CORBIS/GreenLt.Contract).
 Ex. Q: Email Medlin to AG Jones, others, Aug. 30, 2009, re: Tax Valuation
 Ex. S: Email Chain, Pope, Levenson & Others, Nov. 5, 2012
 Motion of Donsbach to be Relieved as Counsel, dtd. Oct. 10, 2018
 Email Bundy to Jg. Early, dtd. Nov. 15, 2018 re: Outstanding Motions
 Ret. of Appellant to Mot. of AG, others to Strike Mot. to Lift Stay, Nov.20, 2018

Respectfully submitted,

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Counsel for Appellant Adele J. Pope

April 8, 2020

STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY

APR 09 2020

Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III, Circuit Court Judge

The Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No.: 2018-002229

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 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.; 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.

PROOF OF SERVICE

The undersigned counsel for Appellant certifies that he has served a copy of the Initial Reply Brief to Attorney General and the Supplemental Designation of Matter to be Included in

the Record on Appeal on all Respondents on the date shown below, by emailing the same to their counsel, addressed as follows:

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s/Adam T. Silvernail
Counsel for Appellant

April 8, 2020

From: Adam Silvernail <adam@silvernailfirm.com>
Sent: Wednesday, April 08, 2020 2:39 PM
To: Ken B. Wingate; Mark V. Gende; Emory Smith
Cc: Adele Pope; Charles Carpenter; Daryl Williams; Jeff Smith
Subject: Bauknight, et al v. Pope, Appellate Case No. 2018-2229
Attachments: Pope 4900 Appeal POS.pdf; Pope 4900 Appeal Reply AG.pdf; Pope 4900 Appeal Reply Designations.pdf

Dear Counsel:

Attached and served on you are the Appellant's Brief in Reply to AG and our Supplemental Designation of Matter. These are being served by email pursuant to the recent Order of Chief Justice Beatty. As directed in that Order, a copy of this email will be filed along with the Proof of Service.

Please let me know if you have any trouble with the files.

Best,
Adam

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