

**RECEIVED**

SEP 25 2020

**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

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Appellate Case No.: 2018-002229

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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.; 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.

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**AFFIDAVIT OF ADELE J. POPE**

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Personally appeared before me, ADELE J. POPE, who being duly sworn, deposes and says:

1. I am over 18 years of age, and this affidavit is based on my personal knowledge.
2. I deny that I have intentionally violated any rule of court in this appeal, or in the lower

court in this case (“Richland 4900”).

3. I am proud to be working currently with the small legal team of Charles Carpenter, Esq.; Wm. Jeffrey Smith, Esq.; Daryl Williams, Esq.; and Adam Silvernail, Esq.

4. I have no knowledge that any member of my legal team has intentionally violated any rule of court in this appeal, or in Richland 4900, and if I had learned of a proposed intentional violation I would not have allowed it.

5. I understand that Mr. Silvernail unintentionally omitted certain citations in the recently filed amended brief in this matter, but have not tried to analyze the characterization of my claimed motives for Mr. Silvernail’s minor errors because there were no such motives.

6. I do, however, take full responsibility for the actions of Mr. Silvernail and for all members of my legal team; believe that each has a record of ethical and appropriate behavior before the Court; and believe that each has competently and ethically handled this very difficult litigation, especially in the face of troublesome legal tactics employed by Richland 4900 Plaintiff Tommie Rae Hynie, Legacy Trust owner-successor Forlando Brown, and those associated with them.

7. Since early 2008 Mr. Williams and I have gained firsthand knowledge of the troublesome legal tactics of Forlando Brown, who was aligned with felon David Cannon and Albert Dallas from March 2007 until Mr. Cannon’s death more than 10 years later.

8. Mr. Williams, along with Elizabeth Van Doren Gray, Esq. and members of her firm, was involved in U.S. District Court Case 3:08-cv-00014-WOB from its filing by Forlando Brown on January 2, 2008, until its conclusion about 7 years later.

9. The “Forlando Federal Suit” sought to enjoin entertainer James Brown’s 2000 Trust,

of which Robert Buchanan, Jr. and I were then trustees, from taking any action until Mr. Cannon and Mr. Dallas were reinstated as Mr. Brown's trustees.

10. Forlando Brown asserted in his 50-page federal complaint that he was an impoverished student seeking only to carry out the wishes of his grandfather James Brown, but he was actually part of TJBL, an investment group seeking to purchase James Brown's music empire for about \$100 million; pay about \$25 million to Messrs Cannon, Dallas and their music manager; and from which Mr. Cannon and Mr. Dallas were also seeking options or a "kickback."

11. Mr. Silvernail has been involved in James Brown matters since 2007, beginning as an undergraduate assistant in my office; later serving as a law clerk; and then serving as a lawyer.

12. From 2009 until 2013 Mr. Silvernail, both before and after becoming an attorney, worked extensively with Mr. Buchanan's and my *pro bono publico* lead counsel in the *Wilson v. Dallas* appeal, James Richardson, Jr.

13. Mr. Buchanan and I wanted to make Mr. Richardson's *pro bono publico* work for James Brown's charity as easy for him as possible, and Mr. Silvernail assisted Mr. Richardson in any way he was needed.

14. From 2011 to 2020 Mr. Silvernail has been counsel of record in two unprecedented James Brown FOIA cases, and the appeals of those cases, in which the Attorney General has declined for 9 years to release under FOIA the Special Counsel Litigation Retention Agreement with the law firm of Kenneth Wingate, Esq. (collectively "Wingate")

15. The FOIA cases also seek a \$4.7 million at-death valuation of James Brown's music empire (the "Afterman \$4.7 Million Value") by Peter Afterman, who, according to his recent

federal court declaration, has served Ms. Hynie and her counsel since 2013.

16. Today, after being dismissed by the circuit court in 2016, the FOIA cases have been remanded to the circuit court, where the Attorney General is now seeking to strike affidavits of citizens filed in 2011 and 2012 urging him to comply with FOIA.

17. Mr. Silvernail has also been involved in Aiken County Case 2012-CP-02-1337 (“Aiken 1337”), which related to my 2007 SA fee of \$47,972; my claim for payment for the 5½ years of my service to Mr. Brown’s estate, trust and 2000 charity, for which I have not been paid; and the costs I paid out of my pocket for the appeal which became *Wilson v. Dallas*.

18. Mr. Carpenter became involved in my James Brown matters after Ms. Hynie and Louis Levenson, Esq. announced on May 29, 2013 their plan to disregard *Wilson v. Dallas* and reinstate the AG’s 2008 settlement voided by the Supreme Court three weeks earlier.

19. Ms. Hynie’s position about Mr. Buchanan and me, and about the AG’s 2008 settlement, is set out in an Associated Press article issued just ahead of the November 1, 2011 oral arguments in *Wilson v. Dallas*:

James Brown’s estate had withered to just \$14,000 and his estate was saddled with more than \$20 million in debt before a professional manager was able to turn it around, an attorney told the Associated Press.

Under a complex 2009 settlement the manager took control of Brown’s assets from the estate’s trustees. That manager wiped out the crushing debt and paved the way for thousands of needy students to receive full college scholarships by next year ...

...  
The full details of that settlement and the dire conditions of the estate...were provided to the AP by David Black, an attorney for the money manager.

And now that deal -- which gave about half of Brown’s assets to the trust, a quarter to Brown’s widow and young son, and the rest to

his adult children -- could be in jeopardy because the ousted trustees claim the deal should never have been approved and should be thrown out.

20. Mr. Black was further quoted in the article as saying:

“Placing Pope and Buchanan back into power would be similar to throwing a grenade into the James Brown music empire,” said David Black, an attorney for Russell Bauknight, the court-appointed special administrator and trustee for Brown’s estate and the charitable trust.

21. Mr. Carpenter served as a modestly-paid consultant between 2013 and June 10, 2015 as I attempted to persuade the Attorney General and others not to permit Ms. Hynie and Mr. Levenson to reinstate the AG’s 2008 settlement.

22. During this period, Mr. Carpenter, *pro bono publico*, offered to represent me in connection with a petition for certiorari, with the United States Supreme Court related to Ms. Hynie’s spousal status and its negative impact on the “I Feel Good” charity’s U.S. copyright royalties, but my efforts were opposed by the estate and unsuccessful.

23. My efforts to persuade the Attorney General to save the “I Feel Good” charity ended abruptly on June 10, 2015, but I continued to consult with Mr. Carpenter as the sanctions claims, motions to strike and other aggressive actions were taken by Ms. Hynie and those who continued to be aligned with her. He officially joined our legal team in early 2019.

24. Mr. Smith, in addition to being a Georgetown Law Center graduate with concentration on IP issues, was also a deejay while securing an engineering degree at Clemson and being president of the Philosophy Club. He is a scholar and has had a lifelong interest in music.

25. In 2008 Mr. Smith agreed to consult, for \$50 an hour, with Mr. Buchanan and me on developing a plan to protect James Brown's "I Feel Good" charity from premature and improper Copyright Act termination rights elections by claimed heirs which could begin to have a small impact on about half (the U.S. royalties) of James Brown's \$4 million annual royalty stream as early as 2012.

26. Mr. Smith's work for the Estate ended in August 2008 when the Attorney General assumed the right to declare Ms. Hynie and certain others to be James Brown's heirs and give them half of Mr. Brown's charity and about \$2 million a year for their termination rights.

27. In April 2011 Mr. Smith and I circulated to professionals a draft of *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown "I Feel Good" Trust doesn't...*, which dealt with the damage to Brown's charity of the AG's 2008 settlement and the proposed devaluation of Mr. Brown's music empire that would become the Afterman \$4.7 Million Value.

28. I designated Mr. Smith as a termination rights expert in both Richland 4900 and Aiken 1337, but he was opposed by Mr. Bauknight's counsel and not allowed to testify about these issues in the Aiken 1337 trial.

29. After Mr. Silvernail became ill, Mr. Smith, who had been on retired status with the S.C. Bar Association, reactivated his status, and has since been a valuable member of our legal team.

30. All of the cases became more complex, and personal attacks and requests for sanctions increased, after October 2016 when now-Governor Henry McMaster testified under oath that he did not authorize Mr. Wingate to bring Richland 4900 in the name of the State/AG;

did not authorize Mr. Bauknight to act “on behalf of” the AG in Richland 4900; and did not even know he was a named Plaintiff in Richland 4900 until after leaving office as AG in January 2011..

31. Shortly after that I deposed Mr. Bauknight in Aiken 1337, where he stated:

So your ultimate fight to the South Carolina Supreme Court (*Wilson v. Dallas*) which rem[an]ded the settlement agreement back to Judge Early, your fight not only did away with termination rights for the benefit of the Estate, but lo and behold, what a nonattorney in January 2009 who had been on the job for less than 30 days, what I testified to could be happening, actually did, happen, Ms Pope. And now I stand here today running an estate and trust that’s at severe risk because of you, personally -- because of you personally – severe risk of losing a spousal share on an admitted spouse share. You own that. You have personally done everything possible to dismantle the charity that Mr. Brown intended to have. You did all that for the sake of your personal well-being and wealth. That’s just beyond repair.

. . . And, thanks to you, I’m at risk of losing – what is it, a third to a half of the estate because of you. [p. 99,100]

32. When questioned further about Ms. Hynie’s public admissions about her first marriage and ceremony with James Brown which her attorneys called the “Hynie diary” Mr. Bauknight stated:

**Q. Mr. Bauknight, have you been attempting since 2011 to conceal the Hynie diary?**

A. That’s a bold accusation, Ms. Pope. I can tell you this: I have never once seen the Tommie Rae Brown diary... [p. 100]

**Q. If that document shows as Mr. Buchanan and I knew, that Tommie Rae was married, living in Texas, and even thought she might be pregnant before she met James Brown, shouldn’t you, as the person charged with saving or protecting the “I-Feel Good” Trust, be trying to make sure that that document is viewed by any court that might take funds from the “I-Feel Good” charity?**

A: Well, Ms. Brown

MR. BLACK: Ms. Pope.

A. I'm sorry, Ms. Pope. I wouldn't want to insult Ms. Brown that way. Ms. Pope, I don't need to save this trust from anybody but you. You're the only person who has personally dismantled this estate and trust.

...

33. Personal attacks have been the hallmark of Richland 4900 and Aiken 1337 since, and in 2020 Ms. Hynie's attorneys have asked both this Court and the Supreme Court to hold me in contempt.

34. Attached hereto as Exhibits A, B and C are affidavits of Mr. Smith, Daniel Speights, Esq., and Wallace Lightsey, Esq., I provided to the Supreme Court earlier this year when a Wingate firm member asked the Supreme Court to hold me in contempt of a 2015 Supreme Court Order.

35. While seeking sanctions against me for an inadvertent error of my counsel, a number of Richland 4900 Plaintiffs – Deanna Brown-Thomas, the Estate of Venisha Brown, Dr. Yamma N. Brown, and Tonya Brown (Fegan) – have recently noted in a federal case the difficulties we have faced with Ms. Hynie and her counsel since Richland 4900 was filed against us a decade ago. They said:

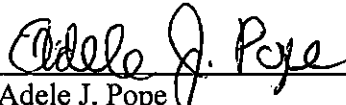
In desperation, Hynie, who spent 14 year assaulting James Brown's estate and Charitable Trust in the probate court solely for financial gain, touts her charitable intent, claiming that she was to contribute "millions" to the Estate...Hynie tried the same transparent pandering and hyperbole with the South Carolina Supreme Court...

...


...[I]f Defendants' objective was to conserve attorney fees, they, including Bauknight, would have long ago come clean and produced their secret agreement(s) instead of making one dilatory motion after another, exponentially driving up costs for everyone, and imposing on the Court's limited resources. Hynie's express suggestion to ...this Court that they should apply something less than the law and proper legal standards in ruling on her motions insults the

integrity of the judicial process and all concerned. [*Brown-Thomas v. Hynie*,  
S.C. Dist Ct. 1:18-cv-02191- JMC, P. Opp. Entry No. 277, 9/124/20, p. 2, F.2]

FURTHER DEPONENT SAYETH NOT.

  
Adele J. Pope

SWORN TO before me this  
25th day of September, 2020

  
\_\_\_\_\_  
Notary Public for South Carolina (L.S.)  
My Commission expires: 6/27/29

# Exhibit A

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF GREENVILLE )

**AFFIDAVIT OF**  
**WALLACE K. LIGHTSEY**

The affiant, Wallace K. Lightsey, after being duly sworn, states as follows:

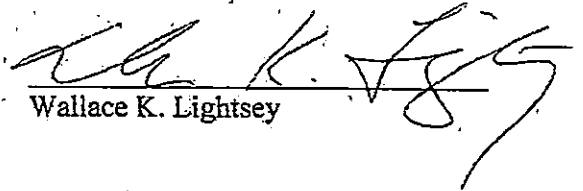
1. I am a member of the law firm Wyche P.A. (the "Wyche Firm"), and practice law in Greenville, South Carolina. I am a 1979 graduate of Duke University and a 1983 graduate of Harvard Law School. I clerked from 1983 to 1984 for Judge John Minor Wisdom of the United States Court of Appeals for the Fifth Circuit, and from 1984 to 1985 for Chief Justice Warren E. Burger of the United States Supreme Court. I was admitted to the South Carolina Bar in 1986 and have been in private practice with the Wyche Firm from my admission to the bar to the present.

2. My law practice has been and continues to be primarily in the area of complex civil litigation, in which I have participated in many different types of cases involving novel issues of law, shareholder and minority owner oppression, intellectual property disputes, media and First Amendment litigation, and general business, corporate, and commercial litigation. A significant part of my practice has been disputes over intellectual property, primarily copyright, trademark, and trade secrets litigation. Within that area, over the course of my career, I have handled hundreds of copyright cases in federal courts in South Carolina, North Carolina, Georgia, Tennessee, Virginia, West Virginia, Texas, Arkansas, Massachusetts, and Ohio.

3. In 2016, I was asked by Adele Pope if I would act as an expert witness on copyright termination and recapture rights in connection with *Pope v. Estate of James Brown et al.*, Case No. 2013-CP-02-1337 (Aiken Cty Cir. Ct.) ("Aiken 1337"). I was glad to do so, and did so without charging either party. My understanding is that that Aiken 1337 concerns Ms. Pope's service and compensation related to the Estate and Trust of James Brown.

4. After being identified as an expert for Ms. Pope, I received a subpoena from Everett Kendall of the firm of Sweeney, Wingate & Barrow for my file on the matter, in connection with the case of *Bauknight v. Pope*, 2010-CP-40-04900 (Richland Cty Cir. Ct.). I supplied Mr. Kendall a copy of all of my file materials in response to the subpoena.

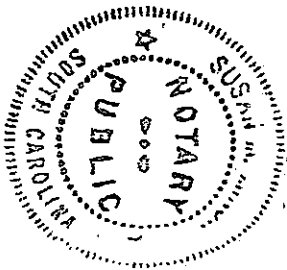
5. On or around April 10, 2017, I gave my deposition in Aiken 1337, which was attended by Adele Pope, as *pro se* counsel, and by Burl Williams, an attorney for the Estate of James Brown and the James Brown 2000 Irrevocable Trust. My statements of fact in the deposition were true and correct to the best of my ability and recollection, and my opinions expressed therein were held by me in good faith and based upon my experience with copyright litigation and study of the law relating to copyright termination and recapture rights. As best I recall, my file for the matter was made an exhibit to the deposition.

  
Wallace K. Lightsey

Sworn to me this 30<sup>th</sup>  
day of June, 2020

Susan M. Minor  
Notary Public for South Carolina

My Commission Expires: 12/10/2023



# Exhibit B



Based upon my professional association with Mrs. Pope for over forty years, I find such an assertion to be unfathomable. While I have no knowledge about the facts in this matter, my experience is that filing sanctions against an opposing counsel is a last resort.

  
DANIEL A. SPEIGHTS

SWORN TO before me this

6th day of July, 2020

Rhonda L. Towers (L.S.)

Notary Public for South Carolina

My Commission Expires: 3/7/2029

# Exhibit F

# Exhibit C



have attended many concerts over the years, including the 1969 Woodstock Festival.

8. For 6 ½ years I served as a patent examiner in the U.S. Patent and Trademark Office.

9. For many years I was the proprietor of an electronic business, but maintained a small IP practice, representing the S.C. Inventors' Group and others.

10. In June 2008 I was engaged by Ms. Pope and Robert Buchanan, Jr., to assist the Estate of James Brown with the development of a plan to protect the copyrights and royalties Mr. Brown devised to his 2000 Trust and "I Feel Good" charity.

11. That month I began to work with Ms. Pope to review the royalty income and sources of income with the general plan of preparing for attempts of Mr. Brown's heirs and claimed heirs to exercise termination rights under Sections 304 and 203 of the U.S. Copyright Act after 35 or 56 years.

12. Even if Mr. Brown's heirs, by proper majority, exercised their first available termination rights elections, the elections would not begin to diminish the royalty stream Mr. Brown wanted for needy students until at least 2012, giving the Estate a reasonable time to prepare for what would later be called the "coming storm" of termination rights.

13. A "Family Circle" created by an Augusta, Georgia media outlet about a year after Mr. Brown's death, provided information about the complexity of

determining who might be Mr. Brown's heirs under the Copyright Act.

14. At the time I was engaged, Tommie Rae Hynie Brown (Tommie Rae) was seeking to be declared the spouse of James Brown, which would have given her a favored position with respect to termination rights under the Copyright Act.

15. The Estate, at the time, took the position that Tommie Rae was not Mr. Brown's spouse, but our project would have addressed termination rights whether or not Mr. Brown was determined to have a surviving spouse.

16. In 2009 Mr Brown's potential heirs, and claimed heirs, under the Copyright Act included:

- a. Three biological daughters (Jeanette, LaRhonda, & Nicole), who had passed the Estate's official DNA protocol;
- b. James Brown II, not born of any marriage, who had declined to be tested under the Estate's official DNA protocol;
- c. Michael Deon Brown, then incarcerated in California and seeking DNA testing;
- d. At least two children acknowledged by Mr. Brown in his Will, but whose status as children was challenged by other heirs: ( Daryl and Larry);
- e. A daughter born during Mr. Brown's first marriage; acknowledged in his first divorce; but claimed by some heirs not to be a child: (Lisa);
- f. A claimed biological child of Mr. Brown's deceased son Teddy Brown: (Tonya);
- g. At least three other living children born of marriages: (Terry, Deanna, Yamma); and
- h. Possible additional children, including children in Europe.

17. Shortly after we began the project the Attorney General, Tommie Rae, and some of the above-claimed children reached a settlement by which the Attorney General attempted to decide who would be Mr. Brown's heirs under the Copyright Act and stopped the use of the Estate's official DNA protocol.

18. The Attorney General's August 2008 settlement brought an end to the authorized heirs-determination proceeding Mr. Buchanan and Ms. Pope had begun under an order of Judge Doyet Early, and effectively ended our ability to develop a plan to protect the charity's copyrights.

19. As someone who had been involved in IP issues for forty years, I continued to research termination rights issues, and in April 2011 Ms. Pope and I co-wrote a draft of *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown "I Feel Good" Trust doesn't...*

20. In our April 2011 draft of *Private Foundations*, which was circulated to professionals and the Attorney General, we addressed not only the termination rights issues in Mr. Brown's estate, but a filing by the Attorney General in 2010 which suggested that Mr. Brown's assets were going to be valued at \$12 million or less.

21. Our article addressed the damage to Mr. Brown's "I Feel Good" charity by the combined devaluation and incorrect determination of heirs which had been made by the Attorney General in his 2008 settlement.

22. *Private Foundations* also proposed a method we called "splitting heirs" by which charities could work with the most cooperative heirs holding termination

rights in order to minimize the impact of termination rights on the charity's royalty stream.

23. Our article emphasized the importance of a charity's having independent advisors who might work well with heirs, but who would be sure to protect the interest of the charity.

24. In 2011 and 2012 interest in termination rights was increasing because in 2013 many songwriters, and heirs of deceased songwriters, whose songs were published in 1978 would have the opportunity to benefit from the exercise of termination rights, and many elections to terminate require two years' notice.

25. Two articles issued in 2012, *Nine Ways to Avoid Copyright Termination, Part I and Part II*; suggest strategies for publishers, charities and others to avoid the diminution of their U.S. royalty streams through termination right elections by heirs.

26. Shortly after we circulated our draft article in 2011, we learned that the Attorney General and others were actually claiming that Mr. Brown's music empire was worth about \$4.7 million, causing even greater damage to the charity than our article indicated.

27. After the \$4.7 million claimed value of Mr. Brown's music empire was announced, I became interested in FOIA cases in which Ms. Pope and a local journalist were both seeking this important document.

28. At oral argument in *Wilson v. Dallas* in November 2011 it is my

understanding that counsel for Russell Bauknight claimed that termination rights were all that the estate of James Brown was about; that nobody was trying to buy James Brown's music empire; that Tommie Rae's elective share claim was a slamdunk; that Tommie Rae and her son controlled the copyright terminations; and that there would be little left in James Brown's charity by 2023 if the Attorney General's 2008 settlement were not approved.

29. These representations were incorrect for a number of reasons, including:

- a. The termination rights of the heirs of James Brown apply only to the U.S. royalties, so that about \$2 million of the \$4 million annual royalty stream, the non-U.S. royalties, will not be affected by termination rights.
- b. Brown's valuable right of publicity, the right to exploit his famous image and persona, is not subject to termination rights elections;
- c. In testimony in 2018 -- years after Mr. Brown's death -- expert Brad Sharp, relying on expert testimony of Roger Miller, valued the termination rights of all heirs of James Brown at only \$8.8 million.

30. I have not seen anything to refute Mr. Miller's testimony that the copyrights Mr. Brown devised to his "I Feel Good" Charity are worth 15 – 20 times annual royalties, less the termination rights.

31. Using Mr. Miller's formula, this would mean that the copyrights alone are worth \$60 million to \$80 million, reduced by the \$8.8 million for termination rights.

32. Prior to becoming involved as one of Ms. Pope's attorneys, I was designated as an expert in Richland County Case 2010-CP-40-4900 and in Aiken

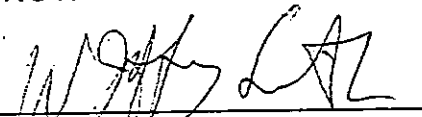
County Case 2013-CP-02-1337, and gave my deposition in the latter case.

33. On July 14, 2017, after reviewing documents and depositions of a number of persons, including Richland 4900 Termination Rights experts Roger Miller and Jonas Herbsman, Esq., and Russell Bauknight (2 depositions), I issued various opinions within my area of expertise to a reasonable degree of professional certainty in an Affidavit/Opinion which can be found in the supplemental record on appeal in Appellate Case No. 2018-2229 at pages 749 859, and I incorporate those opinions in this affidavit.

34. In the trial of Case No. 2013-CP-02-1337 Mr. Bauknight's counsel asserted that neither R.B. Alexander, who valued Mr. Brown's publicity rights, nor I, was qualified as an expert, and Judge Early declined to qualify either of us.

35. Mr. Alexander placed the value of James Brown's music empire at Mr. Brown's death at about \$90 million.

FURTHER DEPONENT SAYETH NOT.

  
W. Jeffrey Smith

SWORN TO BEFORE ME THIS

7<sup>th</sup> day of July, 2020

 (L.S.)

Notary Public for South Carolina

My commission expires:

my commission expires **November 19, 2029**

**RECEIVED**

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APPEAL FROM RICHLAND COUNTY

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

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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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The undersigned counsel for Appellant certifies that he has served a copy of each of the following:

1. Appellant's Consolidated Return to Motion to Strike and Petition for Rule to Show Cause;
2. Affidavit of Adam T. Silvernail;
3. Affidavit of Charles E. Carpenter, Jr., with Exhibits;
4. Affidavit of Thomas H. Pope III;
5. Affidavit of Daryl L. Williams;
6. Affidavit of Adele J. Pope, with Exhibits; and
7. Appellant's Corrected Final Brief


on all Respondents on the date shown below, by hand-delivering a copy of the same to their counsel, addressed as follows:

Kenneth B. Wingate  
Mark V. Gende  
Sweeny, Wingate & Barrow, P.A.  
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[mvg@swblaw.com](mailto:mvg@swblaw.com)

*Counsel for Respondents*

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Robert D. Cook, Solicitor General  
J. Emory Smith, Jr., Deputy Solicitor General  
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*Counsel for Respondent Attorney General*



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Adam T. Silvernail  
*Counsel for Appellant*

September 25, 2020