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**Nov 05 2020**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court of South Carolina

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  
Trial Court Case 2010CP4004900

Appellate Case No.2018-001383

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 Vanisha Brown; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown-Lewis; Yamma N. Brown, individually and on behalf of her minor children, Sydney L., Carrington L., and 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 Vanisha Brown; Lindsey Delores Brown; Deanna J. Brown Thomas; Jason Brown - Lewis; Yamma N. Brown, individually and on behalf of her minor children, 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 the Appellant.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the Attorney General's letter Return to Motion to Supplement and Addendum by emailing these documents to counsel for the other parties at the

email addresses below this November 5, 2020 (Copy of email attached):

Adam T. Silvernail, Esquire  
Law Office of Adam T. Silvernail  
[adam@silvernailfirm.com](mailto:adam@silvernailfirm.com)

Kenneth B. Wingate, Esquire  
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/s J. EMORY SMITH, JR.  
S.C. Bar No. 5262  
Deputy Solicitor General  
Counsel for the Attorney General  
[esmith@scag.gov](mailto:esmith@scag.gov)

November 5, 2020

## Emory Smith

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**From:** Emory Smith  
**Sent:** Thursday, November 5, 2020 2:10 PM  
**To:** 'Adam Silvernail'; Mark V. Gende  
**Cc:** Charles Carpenter; Jeff Smith; Daryl Williams; Ken B. Wingate  
**Subject:** RE: Bauknight v. Pope; Appellate Case No. 2017-01899  
**Attachments:** Return of AG to Motion to Supplement - Case # 2020-001383 (02420459xD2C78).PDF;  
Addendum to Ret. to Mot. to Supplement (02420096xD2C78).PDF

Attached and hereby served upon you is the Attorney General's Return to the Motion to Supplement and Addendum.

Emory

J. Emory Smith, Jr.  
Deputy Solicitor General  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
803-734-3642 Direct

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**From:** Adam Silvernail <adam@silvernailfirm.com>  
**Sent:** Thursday, October 29, 2020 12:42 PM  
**To:** Mark V. Gende <MVG@swblaw.com>  
**Cc:** Emory Smith <ESmith@scag.gov>; Charles Carpenter <charlie@carpenterappeals.com>; Jeff Smith <wjstv@mindspring.com>; Daryl Williams <dwilliams@gertzandmoore.com>; Ken B. Wingate <KBW@swblaw.com>  
**Subject:** Re: Bauknight v. Pope; Appellate Case No. 2017-01899

We consent.

Adam

Sent from my iPhone

On Oct 29, 2020, at 12:11 PM, Mark V. Gende <[MVG@swblaw.com](mailto:MVG@swblaw.com)> wrote:

We consent.

Mark V. Gende, Esq.  
Sweeny, Wingate, & Barrow, PA  
1515 Lady Street  
Columbia, South Carolina 29201  
803.256.2233 – Phone  
803.256.9177 – Facsimile

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**From:** Emory Smith <[ESmith@scag.gov](mailto:ESmith@scag.gov)>  
**Sent:** Thursday, October 29, 2020 12:01 PM  
**To:** Charles Carpenter <[charlie@carpenterappeals.com](mailto:charlie@carpenterappeals.com)>; [adam@silvernaillawfirm.com](mailto:adam@silvernaillawfirm.com); Jeff Smith <[wjstv@mindspring.com](mailto:wjstv@mindspring.com)>; Daryl Williams <[dwilliams@gertzandmoore.com](mailto:dwilliams@gertzandmoore.com)>; Ken B. Wingate <[KBW@swblaw.com](mailto:KBW@swblaw.com)>; Mark V. Gende <[MVG@swblaw.com](mailto:MVG@swblaw.com)>  
**Subject:** RE: Bauknight v. Pope; Appellate Case No. 2017-01899  
**Importance:** High

Counsel:

I would like to ask the Court for a three day extension of time to file a return to the Motion to Supplement the Record, which would then be due November 6. I need the extension b/c of the hearing in Aiken on Monday in two Pope FOIA cases as well as other deadlines, a hearing and a judicial conference call this week.

Please let me know as soon as possible if you will consent or not object.

Thank you.

Emory

J. Emory Smith, Jr.  
Deputy Solicitor General  
Office of the Attorney General  
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**From:** Emory Smith  
**Sent:** Friday, October 16, 2020 12:45 PM  
**To:** 'Charles Carpenter' <[charlie@carpenterappeals.com](mailto:charlie@carpenterappeals.com)>; 'adam@silvernaillawfirm.com' <[adam@silvernaillawfirm.com](mailto:adam@silvernaillawfirm.com)>; 'Jeff Smith' <[wjstv@mindspring.com](mailto:wjstv@mindspring.com)>; 'Daryl Williams' <[dwilliams@gertzandmoore.com](mailto:dwilliams@gertzandmoore.com)>; 'Ken B. Wingate' <[KBW@swblaw.com](mailto:KBW@swblaw.com)>; 'Mark V. Gende' <[MVG@swblaw.com](mailto:MVG@swblaw.com)>  
**Subject:** RE: Bauknight v. Pope; Appellate Case No. 2017-01899

Attached is the AG's request for an extension of time to respond to the Motion to Supplement. I have resent it with the correct appellate no. on it.

Emory

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