

RECEIVED

Aug 30 2021

SC Court of Appeals

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

**Appeal from Richland County
Court of Common Pleas**

The Honorable Clifton B. Newman, Circuit Judge

Appellate Case No. 2021-000518

Adele J. Pope..... Appellant,

v.

Alan Wilson, in his capacity as Attorney General of South Carolina,
.....Respondent.

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

Pursuant to Rule 209, *SCACR*, Appellant designates the following documents to be included in the Record on Appeal herein (with any attachments and/or exhibits, unless otherwise noted):

1. 11/22/11 Order of the Honorable Frank R. Addy
2. 1/11/12 Form 4 Order of the Honorable Frank R. Addy
3. Order of the Honorable Frank R. Addy transferring Newberry County Case No, 2011-CP-38-379 to Richland County
4. 7/5/12 Order the Honorable L. Casey Manning
5. 11/1/2011 Order the Honorable Alison R. Lee
6. 9/14/15 Order of the Honorable Eugene C. Griffith, *Summer v. Wilson*
7. 3/24/16 Order of the Honorable Donald H. Beatty
8. Order, Jg. Early, 6/14/16
9. Order, Jg. Early 6/20/16
10. Order, Jg. Early, 3/15/17, Aiken1337
11. April 1, 2020 Order Denying Cert. (Appellate Case No. 2017-1899)
12. Order, Jg. Newman 5/15/20

13. Order, Jg. Newman 4/1/21
14. Order Jg. Newman, 4/23/21
15. Acknowledgment 2010, AG, others Richland 4900
16. 7/28/11 R4900 Motion to Compel w/ Aff. Pope 8/1/2011 w/ attachments
17. 5/19/10 Complaint, Richland 4900
18. Complaint, dtd. 8/3/11, w/ Exhibits
19. 6/7/11 Motion to Compel Discovery
20. 6/3/11 Ret. Motion to Quash
21. R4900 Mot. Protective Order 7/1/11
22. 9/2/11 Motion to Dismiss FOIA Complaint w/ Exhibits
23. 9/9/11 Motion to Dismiss FOIA Complaint by Legacy Trust
24. R4900 Motion to Dismiss
25. 5/19/11 R4900 2011 Motion to Disqualify
26. 6/7/11 R 4900 Motion to Compel w/ Ltrs. Silvernail, Gende
27. Pls. Mot. for Prot Order. R4900 7/1/11
28. 9/12/11 Plaintiff's Return to Motion to Dismiss, Legacy Trust
29. Sept. 30, 2011 Motion for Summary Judgment w/ Affidavit dtd. 9/30/11
30. 10/13/11 Motion of AG to Strike
31. 10/26/11, Wingate Contract FOIA Motion to Intervene
32. 12/5/11 Motion to Partially Alter Order dtd. 11/22/11
33. 12/22/11 Motion to Strike of AG
34. 12/12/ 11 Case 379 Motion for Sanctions
35. 1/3/12 Plaintiffs' Return to Motion to Strike
36. 1/9/12 Motion to Strike of AG
37. 1/9/12 Motion to Strike of Legacy Trust
38. 2/2/12 Motion of Richland 4900 Plaintiffs and Other to Consolidate
39. 2/22/12 Return and Opposition to Consolidation with Richland 4900
40. 3/7/13 Answer of AG, w/ attachments
41. AG Petition for Rehearing in Wilson v. Dallas, pp. 1, p. 25, 27
42. 3/15/13 Legacy Trust Motion to Stay
43. 3/18/13 Memo Legacy Trust, with attachments
44. 4/1/13 Status Report, w/ Exhibit A, Confirmation and Amendment 1/4/11
45. Petition for Cert, 9/19/19
46. Return Legacy Trust 10/9/19
47. 8/23/12 Motion R4900 Pretrial Pub.w/ Ex. A and 1,3, 8, 12, 13, 19, 21, 55, 56, 63, 74, 75, 81, 85, 87, 97, 98, 100
48. Mots. For Prot. Order, 6/2/11 Hynie, Terry
49. Mots. For Prot Order, Wilson, McMaster, 6/10/11
50. Memorandum AG for 11/2/20 hearing
51. Transcript of Hearing 12/17/12, pp. 1, 2, 37
52. Transcript 5/17/16, p. 1
53. Transcript 11/19/20 pages 1,3-9, 13-14, 16-20, 26-31, 40-42
54. 9/6/11 Affidavit, Pope
55. 9/19/1 Affidavit, Pope

56. 9/16/11 Affidavit Pope
57. 10/6/11 Affidavit, Pope
58. 10/20/11 Affidavit of AG Meyers
59. 12/9/11 Affidavit of Wm. J. Smith
60. 12/8/11 Affidavit, T Pope
61. 1/10/12 Memo of Attorney General Supporting dismissal
62. 1/10/12 Affidavit of Bauknight, w/ Exhibit A, B, C
63. 1/10/12 Response to Brief of AG
64. Affidavit, Deborah Spence
65. Affidavit, Thomas Young
66. Affidavit, Sue Summer
67. Affidavit, S. Farrar
68. Status Report, Jg. Early, 5/8/15
69. *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown 'I Feel Good' Trust Doesn't...*
70. 1/6/12 Affidavit Williams, D
71. Affidavit Pope, 1/6/12 w/ Exhibits
72. Ltr. AG Meyers, 10/3/11
73. Ltr. Pope to Meyers, 10/5/11
74. Ltr. Pope to Meyers 10/17/11
75. 1/5/12 Affidavit of Summer
76. 1/17/12 Affidavit of Pope for Related to Fees
77. 3/27/12 Affidavit of Pope Opposing Consolidation
78. 3/18/13 Supplemental Memo of Legacy Trust
79. Ltr. Gende to Jg. Manning, 5/10/13
80. Ltr. Silvernail to Manning, 4/21/15
81. Email Gende to Jg. Goodstein, 10/13/14
82. 10/27/20 Affidavit Supporting Release of Document
83. Affidavit Pope, 12/18/20
84. R4900 2012 Affidavit, B. Bauknight, w/ Exhibits 1st Acct. p. 1-3, 2d, p. 1-4
85. 2008 Settlement Agreement
86. What Rosen Wants
87. What Levenson Wants
88. Wingate Contract
89. 12/17/10 email black, AG Jones, others
90. Email, Gende, Williams, April , 5/19 – 27
91. Email Jones 1/18/11, w/ attachment
92. Supp. I&A, page 1, filed 5/4/11
93. Ltr. Pope to AG Meyers 7/19/11
94. Affidavit, Pope, Ex. 1, 8/10/11
95. Ltr. AG Meyers to Pope 8/5/11
96. Return, Hynie R 4900 4/25/17
97. Ltr. Pope to AG Meyers 8/7/11
98. Ltrs. Silvernail to Gende, 6/15/11

99. Ltr. Gende to silvernail, 6/17/ 11
100. Ltr. Jones to Manning 9/22/11
101. Affidavit, 9/29/11 Pope
102. Ltr. OAG to Wingate, 4/24/13
103. 12/31/16 Pls. Response and Objection, A1337 w/ Exhibits
104. Depos. Alan Wilson, pp. 47-49
105. Depos. Robert Cook, pp. 31-33
106. 10/22/15 Proof of ADR
107. 1/13/15 Email of Pope to Jgs. Manning and Early
108. 9/18/12 Motion to Dismiss or Stay, Ct. Appeals *Pope v. Wilson, et al*
109. 3/6/15 Ltr. of E. Smith to Clerk, Sup. Ct.
110. 1/5/12 Ltr. of Meyers to Summer
111. 9/2/20 Declaration of Afterman
112. 4/20/15 Order, Sup. Ct.
113. 11/9/16 Ltr. of Robert Cook to Pope

Respectfully submitted,

s/Adam T. Silvernail
Adam T. Silvernail
Law Office of Adam T. Silvernail, LLC
1905 Marion Street (29201)
Post Office Box 7995
Columbia, South Carolina 29202-7995
Telephone: (803) 779-1770
adam@silvernailfirm.com

August 30, 2021

Attorney for Plaintiff