

9. Pursuant to Section 62-3-607, I am asking the court to immediately restrain the personal representative from performing any of the specified acts of administration, disbursement or distribution or to exercise any of the powers of their office, because, as appears in this affidavit, the personal representatives apparently are in the process of taking actions which jeopardize the interest of the petitioners. Pursuant to Section 62-3-614, I am asking the court to appoint a Special Administrator pursuant to S.C. Code Ann. Section 62-3-614 and that such Special Administrator be given the power to preserve the Estate and to secure its proper administration and to conduct the administration of the Estate unless and until otherwise restricted by the Court.

10. I am informed and believe that the personal representatives misrepresented material facts to my husband in the past and have failed to disclose their conflicts and self interests in their dealings with him and his associated entities with respect to contracts made with my husband and those entities and in other matters; have failed to disclose their claims to huge amounts (of indeterminate origin) allegedly due from my husband or is associated entities to said personal representatives, have failed to disclose that they owe his estate for substantial misappropriations; and are currently, unless enjoined, attempting to sell or otherwise dissipate or dispose of valuable assets and rights of my husband, including but not limited to the catalog of music owned by my husband. I am very concerned about the original tapes my husband kept of all of his recordings.

11. I am informed and believe that the personal representatives, who seek the approval of the Court for their authority to handle the affairs of the Estate, have willfully failed and refused to account for their acts for at least the last 6 years wherein they claim they were co-trustees under the purported James Brown Irrevocable Trust.

12. I am informed and believe that that certain liquid assets of the estate, real and personal property are at risk of being lost or dissipated or stolen if this Court does not act immediately.

TOMMIE RAE BROWN

Sworn and subscribed to me on this
_____ day of _____, 2007

Notary Public for the State of _____
Comm. Exp. _____

EXHIBIT A

- ♦ Bedroom suite purchased from Rhodes by Mrs. Brown on March 8, 2004;
- ♦ James Joseph Brown, II, bed and bedroom set, complete with linens-purchased from Rhodes by Mrs. Brown on March 8, 2004 and toys;
- ♦ China, tea set, silver and marble plates;
- ♦ Den Set – including couch, set tea, table, chairs, living room furniture
- ♦ Atrium – Tommy Bahama couch, tables, and trees;
- ♦ Guest House furniture, rugs and art work;
- ♦ One-half of James Joseph Brown, II, clothing, toys and personal effects;
- ♦ Personal pictures, photographs and artwork;
- ♦ Laptop computer; and
- ♦ Televisions (1) in guest house, (1) in foyer closet.