

May 27, 2022

The South Carolina Supreme Court
Att To: Chief Justice Beatty
Re: In the Matter Of The Estate Of Thomas Gaddy Moore
The Appellant Michael Dennis Moore

RECEIVED

vs.

The Respondent Thomas Paul Moore, et al.
Lower Court Case No.: 2016-CP-21-03062
Appellate Case No: 2018-001144

JUN 23 2022

S.C. SUPREME COURT

The reason that I, Michael Dennis Moore, am writing this letter on 5-27-22 to the South Carolina Supreme Court is because I am the personal representative of my father, Thomas Gaddy Moore's, estate. When my father was living, I was also the Power of Attorney over him and all of his assets. My father obviously had a lot of faith in his son Dennis Moore. I am writing the South Carolina Supreme Court because I believe the South Carolina Court of Appeals has erred incorrectly in so many ways with my father's estate case.

I, Dennis Moore, as the personal representative of my father Thomas Gaddy Moore's estate case disagree with the South Carolina Court of Appeals decision and I know for a fact they have made error in this case. Now I am filing an appeal with the South Carolina Supreme Court on their decision. I had asked the Court of Appeals for an investigation into this case but I was denied. I then asked the Court of Appeals for a hearing in this case and once again I was denied. One of my brothers also asked the Court of Appeals for a hearing and he was also denied. Now what I do not understand about the Court of Appeals is that my attorney, David Durant Jr., wrote a letter to the Court of Appeals asking them to be released because he said I was making false accusations against him and his law firm and he was granted his request. Now I would like to know from the Supreme Court how that works? How will they grant an attorney's request but deny a personal representative all of his requests? The appeals attorney David Durant Jr. flat out lied to the Court of Appeals about false accusations and how do I know that? Because I wrote the Court of Appeals telling them to send me a copy of the false accusations that David Durant said I made and I never received a copy.

For the reasons that are listed below in this letter, the Court of Appeals has err.

Statement of Issues:

1. Did the South Carolina Court of Appeals err in their ruling that a separate envelope containing a document with instructions devising a piece of the testator's estate should be integrated into the testator's separate Will when the separate document was not connected to the testator's Will, was not

referenced in the said Will and was not properly executed according to the laws of the State of South Carolina? This document concerning the church property was never signed by my father Thomas Gaddy Moore. There is no date on it, no signatures on it, no one witnessed it, and nowhere in the Will does it say that the property goes to Thomas Paul Moore. That is why I, Dennis Moore, as the personal representative disagree with the Court of Appeals to give this to only one person and not the others because they have no evidence at all to prove that my father said to give the church property to Thomas Paul Moore. How can the courts take my father's property from the rest of the siblings and just give it to one with no evidence that it shouldn't be divided equally? There is no proof from the deceased and this is not in the Will.

2. Did the Court of Appeals err again when they said in their letter to the personal representative that the Court of Appeals is going to uphold the lower courts decision? I can not believe that any courts would up hold any one wrong doing. The Court of Appeals knows this case was unfair and unjust according to the ethical rules that attorneys and judges have to go by. There were so many rules of law that were broken in The State of South Carolina. You mean to tell me that Dennis Moore, the personal representative of my father's estate, that it is legal for a Probate Judge, Mr. Scott, and the opposing attorney, Mr. Cal Pierce Campbell, to rule on my father's estate when both of these gentlemen were from the same law firm and they both at one time were shareholders in the same law firm. That is legal for him to rule on my father's case? Please help me understand this. The Court of Appeals knows this case was a conflict of interest and misconduct on both of these gentlemen's part. I could never get a fair trial under those terms. Also knowing in the lower court decision in their ruling that the Appellant Dennis Moore did not have a chance in hell to win this case not when both of them are from the same law firm. You know for a fact this Probate Judge was not going to rule against his partner not when they both were from the same law firm and both were shareholders. Also, knowing in the lower court decision in their ruling that the Appellant Dennis Moore was account for loans to Moore's Cars, LLC. Based on the facts in this case that evidence was allowed to be submitted in support of this judgement was ultimately brought to the attention of the parties minutes before the hearing began which in turn prejudiced the Appellant making him unable to prove a proper defense or counter to the improperly submitted evidence. They brought checks into the probate court room on the final day of the ruling. If you would, please look at the checks exhibits that the lower court is charging he Appellant Dennis Moore for. They said that I Dennis Moore got this money when my name is no where to be found of any of the checks they are accusing me of. My name is not on the front of the checks, the back of the checks, and they do not have deposit slips where I ever received this money and put it in my business or my personal

account. You know why? Because it never happened! I would like for the South Carolina Supreme Court to take a close look at the checks and the exhibits that were presented in the lower courts and you will see that someone made a copy of the front of the checks but did not make a copy of the back of the checks. You know why they did not make copies of the back? Because my name, Dennis Moore, is not on any of those checks that they are charging me for in the lower courts. Every exhibit check was made to Thomas G. Moore and deposited in Thomas G. Moore's account and not in Dennis Moore's account. There were 2 separate accounts for Moore's Cars. My father banked with First Bank and Dennis Moore has never been in First Bank. You can look on the signature card at First Bank and you won't find my name, Dennis Moore, on the account of none of the checks they are charging me for. Yet with all of that said, the Court of Appeals is going to uphold the decision of the lower courts. There is nothing in my father's Will that says his son Dennis Moore owes the estate one dime. The lower courts do not have any evidence or proof from my father that I owe the estate anything. This whole case was nothing but a scam and fraud between the Probate Judge Mr. Scott and his partner the opposing attorney Mr. Cal Pierce Campbell. This probate judge did not even go by my father's Will. He took that himself and threw it out the window basically. The judge judged the Will for himself to suit his partner's client. If you notice, everything that his partner Mr. Campbell asked for, the probate judge gave it to him and did not rule one thing in my favor. Now you tell me that is not biased. Another thing I don't understand is, if I were guilty of all the lower courts are charging me for, do you really believe that Mr. Campbell the opposing attorney would drop all charges against me? Well, that is what he told my attorney at the time, David Smith. Mr. Campbell called David Smith and told him to call Dennis Moore and tell him that all charges would be dropped if I would be willing to take my money in the estate and give it to his client, Thomas Paul Moore. That tells me right there and it should tell the courts also that Mr. Campbell himself didn't even believe the way the Probate Judge ruled. Also, that sounds like Mr. Campbell is also trying to bribe Dennis Moore with money. He was telling me if I would give his client my money in the estate that he would drop all the charges against me. I told my attorney, David Smith, to call him back and tell him no thank you because I was not going to give my money to anyone when my father wanted me to have it and knowing also I had done nothing wrong.

3. Not only was this case a conflict of interest and misconduct by the probate judge and his partner the opposing attorney Cal Pierce Campbell, but I also got scammed 2 times by my own appeals attorney, David Durant Jr. and his father David Durant Sr., in Surfside Beach, SC. My wife and I went to the beach to David Durant's law firm in January of 2017 to sit down and talk to both of the attorneys and gave them the order that the Probate Judge Mr. Scott had put on me for \$699,388.00. When David Durant Sr. got finished

reading the Probate Court order, he looked at me and my wife, Crystal Moore, and said "Dennis, you do you were ambushed by the good ole' boys, don't you?" He also stated "that judge needs to retire anyway." Well, then David Durant Jr. and his father must be a part of the good ole' boys and the reason I say that is because David Durant Jr. nor David Durant Sr. ever told me on the very first day we were in their law firm in 2017 that his other son/Jr's brother was working with and practicing law for the same law firm that was suing me for \$699,388.00. That was never mentioned to me or my wife on that day. Now, David Durant Sr. did call me and tell me his son was working and practicing law with the same law firm that was suing me AFTER we had already gone to Circuit Court which was months later. At that time, David Durant Sr. called and said he meant to tell me but he forgot. When he called, he said now we have someone on the inside of Turner Padgett to give us the scoop, like that was supposed to make me feel better. You know both of them did not forget to tell me that their son/brother was working and practicing law with the same law firm that was suing me. No, they both knew it but they were not going to tell me that on the very first day in 2017 because they knew I would have never hired their law firm on those terms. No, they waited until after the fact and after they took my money and then they called me months later to cover their tracks. I told them also about the Probate Judge and the opposing attorney and you know not one time did they ever mention this to the judge or the courts, they kept that a secret also. When I asked them about why they didn't mention this to the courts and the judges about what happened, David Durant Jr. said I told you I was not going to mention anything about the Probate Judge or his partner the opposing attorney, but yet his own father said I was ambushed by the good ole' boys yet David Durant Jr. did not want to mention their names. Here is the bottom line: if they would have told us in January of 2017 that their own brother was working and practicing law with the same law firm that was suing me, I would not have hired them. They did not say anything about it upfront. Had they done so, my wife and I would have left his law firm and not hired him. There is no way I would have given him our money to represent me in this case on those terms. Instead, they took my money to give me a call months later to give me the bad news.

4. Based on the facts and evidence, David Durant Jr. never submitted anything to clear this matter up in Circuit Court. The reason I said that is because the Circuit Court Judge, Thomas Russo, said in his order that the reason that I lost the case is because my attorney, David Durant Jr., never brought in any new evidence. I know for a fact that David Durant Jr. never argued the \$450,000 checks to the judges because if he would have done so, he could have shown him the back of the exhibit checks and this judge would have thrown this case out, but he decided not to say a word about it. He decided to let them go ahead and charge his client for the money his client never received and

should not be responsible for. Then, David Durant Jr. writes the Court of Appeals and told them that I was making false accusations against him and his law firm when all I was doing was asking him why he didn't tell me about his brother before he took my money and also why he didn't tell the judges and courts about the Probate Judge and the opposing attorney. However, was it because he knew his own brother worked with and practiced law for them also? Is that the reason? I could have submitted more evidence and facts in this case than was submitted by my attorney, David Durant Jr. My attorney basically just took \$30,000 of my money for nothing because all he did was try his best to hide the facts and evidence of this case. That is not a false accusation, it is accurate in that everything I asked him to do was not done. Then he wrote the Court of Appeals and flat out lied on his client when he said I was making false accusations when all I was doing was asking him to do his job because I paid his law firm \$30,000 for that purpose and he was not defending me. Then, the Court of Appeals granted his request. Now since he got by with the Court of Appeals and left his client with \$30,000 of our money. David Durant Jr. wrote Dennis Moore a letter and anyone is welcome to read it. David Durant told me in 2022 in his letter he said if you go and get a third party in this case, I and my law firm would be forced to sue you. Now that sounds like a threat to me. He's saying if I go get a malpractice attorney, which would be a third party, that he would take action against me. Now if David Durant did nothing wrong or he was not trying to hide something and everything in this case was legal and he did his very best to win this case for his client then it looks like to me that David would welcome a third party and not try to threaten his client. I don't like how an attorney can treat me in such a way and take \$30,000 of my money and left me out in the cold and didn't care what happened to his client. He had this case for 5 years and he never said one word about false accusations until he knew he might be in trouble for the actions he and his law firm took. The Court of Appeals let him off the case for what he had done in the above letter. That is wrong of them to do that. Also, as far as the crooked Probate Judge and his crooked partner the opposing attorney trying to take everything I have ever worked for. I don't care what anyone says, they are dirty and dishonest because they know I did not get that money. If they had won that case fair and honest, Cal Pierce Campbell would have never made that offer in 2016.

5. The Probate Attorney Porter Stewart knew all about this scam and fraud going on and he went right along with them and never not one time did he himself ever tell Dennis Moore the Probate Judge and the Opposing Attorney were from the same law firm. Now, tell me how dirty that is. Another attorney that I am paying for nothing but to scam me out of my money. I just asked Mr. Porter Stewart last week on May 18, 2022, did he know the Probate Judge and the opposing attorney were from the same law firm and he said yes. I asked him why he didn't pull me aside to tell me that the first day

we were in court because if he would have told me that I would have never let them rule on my father's estate case knowing that both of them were from the same law firm. Then Mr. Porter Stewart said we need to hire another attorney to help us out with this case and he did. Mr. Porter Stewart got the attorney David Smith to help him with the case and come to find out later on David Smith is not even a Probate Attorney. He also knew himself that he was not supposed to take this case because he didn't know anything about Probate court, yet that was the attorney I was paying for. David Smith also knew about the probate judge and his partner the opposing attorney and did not say one word about it but yet he also took my money right along with all the other crooked attorneys that I have dealt with in this case. All of these attorneys knew what was going on because they were all from Florence, SC. Mr. Porter Stewart knew it because he was the lead attorney in this case, Mr. David Smith also knew it, and David Durant Jr. knew it too because his brother worked with and practiced law with the ones that were suing me. I called David Smith in May of 2022 and asked him questions about this case. He told his secretary to tell Dennis Moore that he could not talk to me because it would cause a conflict of interest. Now he was telling me he can't speak to me because of a conflict of interest but yet he knew that there was a conflict of interest earlier on in the estate case and did not tell his client about it. For him to take a case that he didn't know anything about because he is not a Probate attorney and he did not tell me that upfront either is not right. I have called him on three different occasions trying to talk to him about this case and he will not speak to me or give me an appointment.

6. I have never seen so many crooked and dishonest attorneys and a crooked probate judge that is not even there any more and practicing law with another law firm in my life. All you would have to do is read his order. He did not rule on one thing in my favor. Everything went to his partner's client and that was not good enough for him. He even cut down the personal representative's commission to \$50 AND said I had to pay every one's attorneys fees also.
7. I hope and pray the Supreme Court would truly take a look at all the facts and evidence in this case and overturn the Court of Appeals decisions where they have err in this estate. No one went by the rules and laws of the State of South Carolina. I hope and pray that the Supreme Court would dismiss the whole thing for all that happened in this estate case. I hope you will go back to the evidence and even the Will itself. I have never heard tell of a Probate Judge not going by what a Will reads within it. Also, have you ever in your career or being a Supreme Court judge ever heard tell making a personal representative pay back money? More than the estate itself is even worth. I have never heard of that before and I really never heard tell of a personal representative paying back anything to an estate. If that were the case, why were the appointed by the person to be in charge of it in the first place? I

hope you will give the personal representative commission back to him that the laws call for. I hope you will make someone pay all my attorneys fees. I am also asking the Supreme Court to please let someone do an investigation into this case to see what I'm trying to tell the courts now and what I have been trying to say all along. Give me the same chance that the Court of Appeals gave to David Durant Jr. I beg of you not to deny this case.

Thank you,
Dennis Moore

Personal Representative of Thomas G. Moore's, My father's, estate