

RECEIVED

Nov 05 2024

SC Court of Appeals

**From:** [Dorothy Pierce](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Donna Moore](#); [Rick McDuff](#)  
**Subject:** Re: Second Amended Notice of Appeal- Case: 2024-000455  
**Date:** Tuesday, November 5, 2024 10:33:08 AM

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\*\*\* **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Clerk of Court,

I am writing to address Mrs. Donna Moore's repeated frivolous claims that she has not received filings, despite my consistent efforts to serve her promptly. Mrs. Moore has, on multiple occasions, emailed the court on the same day a motion is filed, claiming non-receipt of documents. If she indeed had not received the filings, it would be unlikely she would know to contact the court specifically about each filing immediately upon submission. The court usually acknowledges receipt of these documents and copies all parties with stamped records.

In addition to providing Mrs. Moore with email copies of all documents filed with the court, I have also mailed hard copies to her address, which was included in the only filing she made in November 2020 waiving her rights. Given standard postal timelines, mailed documents typically reach recipients within a few days. Her immediate complaints to the court regarding filings—on the same day or the next day after I provide email service—suggest otherwise.

Furthermore, upon information and belief, Mrs. Moore resides intermittently at her residence, with her mother, and at her ex-husband's house, which raises concerns about the accessibility of her mail. Notably, even after receiving filings by email or by mail, she has not responded to any filings in the four years that this matter has been litigated. Without a proper appearance in court, it would be difficult to ascertain where she can reliably receive her correspondence.

For the last three and a half years, Mrs. Moore accepted only email service of court documents at all levels, including the Court of Appeals. However, early this year, she decided that all service from me should be directed to her via mail. This change appears to be intended to increase the burden on the Appellant, especially considering that Mrs. Moore is not officially participating in the process. She has defaulted on the filing process and waived her rights to service.

Additionally, under SCACR Rule 208, Mrs. Moore is barred from participating in the appellate court process in the Court of Appeals, having failed to engage in the appeal process in the Circuit Court despite proper service. It is worth noting that she was properly served with all Circuit Court appeal documents but never filed any return or Notice of Appearance. She was present on the court premises the day of the hearing but chose to sit outside while the other respondents' attorney argued the case.

For clarity and to ensure due process, if Mrs. Moore wishes to receive official service of documents, I respectfully suggest that she file a formal Notice of Appearance with the Court of Appeals and pay any required fees. After she files this Notice of Appearance, I will file my return in opposition, as she has failed to participate in this appeal from the lower court.

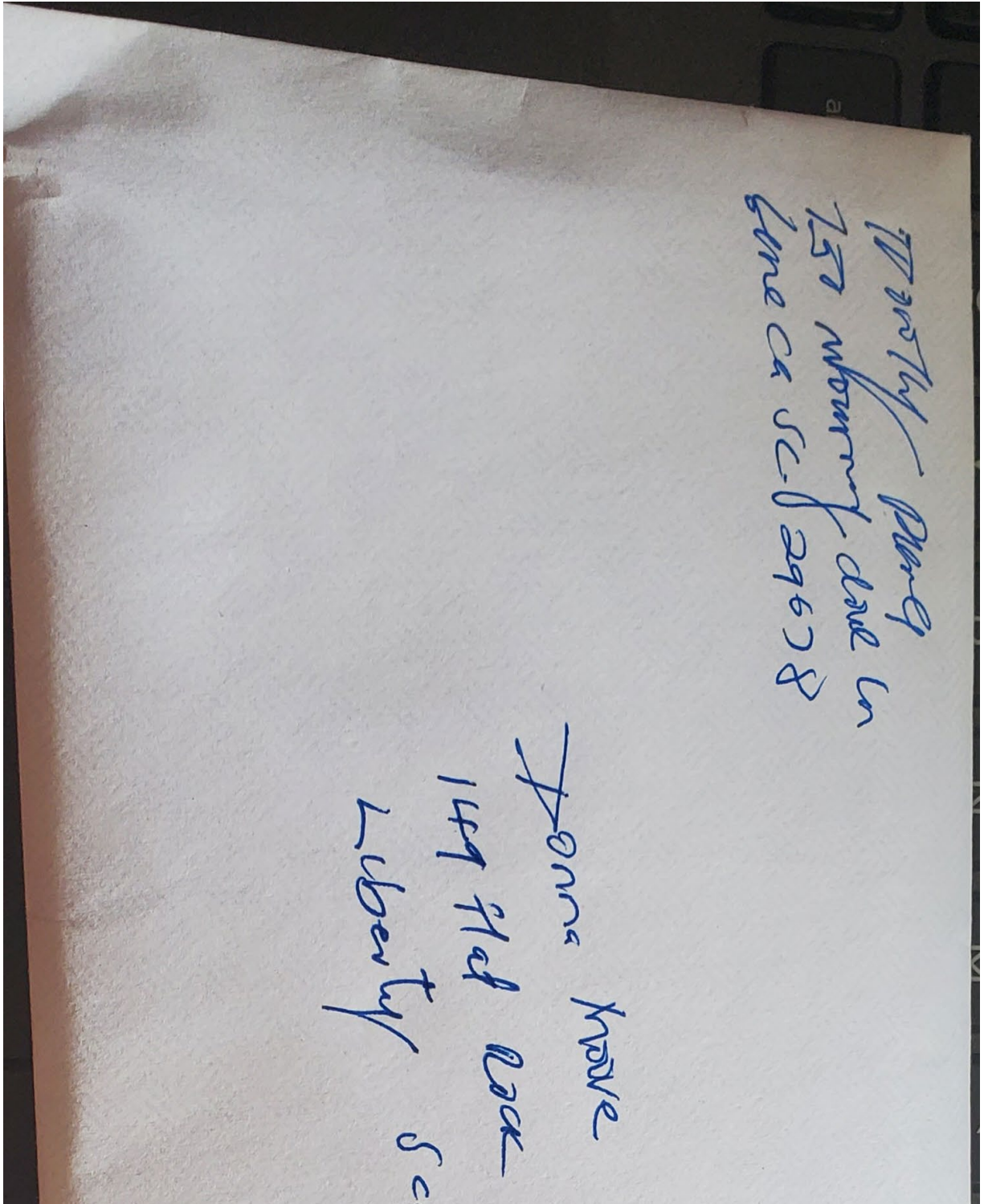
I have attached a copy of the envelope containing the most recent mail service to Mrs. Moore,

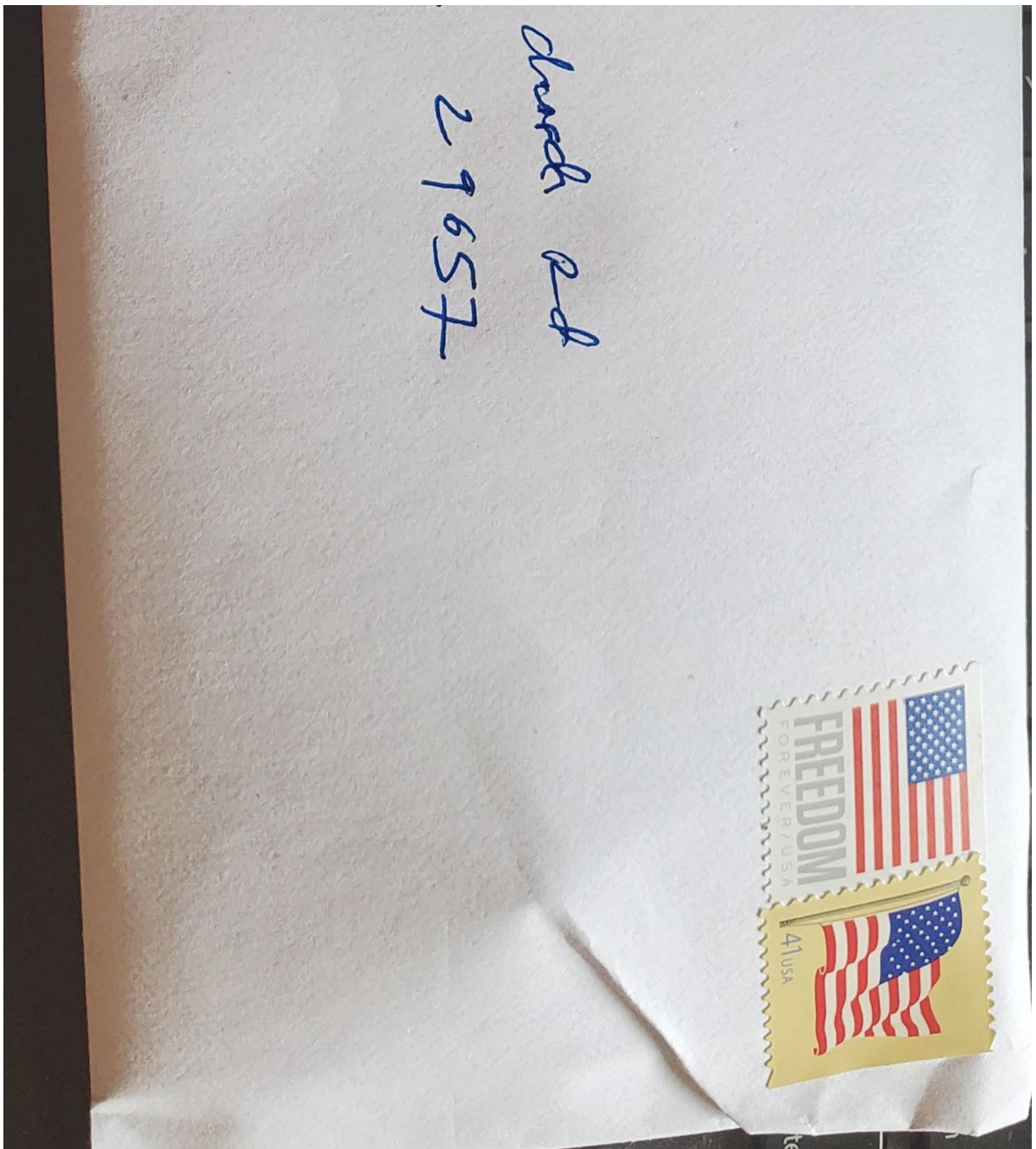
which should be delivered within a few days.

Thank you for your attention to this matter.

Sincerely,

Dorothy Pierce, Appellant.





On Tue, Nov 5, 2024, 8:34 AM Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)> wrote:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Donna Moore <[75dmoore@gmail.com](mailto:75dmoore@gmail.com)>  
**Sent:** Tuesday, November 5, 2024 12:41 AM  
**To:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Cc:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Rick McDuff <[rick@mjmlawsc.com](mailto:rick@mjmlawsc.com)>  
**Subject:** Second Amended Notice of Appeal- Case: 2024-000455

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Dear clerk,

To clarify: My address remains the same since 10/2015. The same address that Mr McDuff, the Circuit Court, the Court of Appeals and the probate court send correspondence to/ filings to. [149 Flat Rock Church Rd. Liberty SC 29657](#). Appellant has also sent a couple of previous court filings to this address over the last 49 months.

As a listed respondent; I am entitled to receive all notices, filings, briefs, appeals, amended appeals, ect. As a listed respondent; I do not have to formally engage with Appellant to be entitled to receive the above. I had requested in writing on multiple occasions to all parties to utilize USPS mail as service option vs email/ electronic on all court related documents almost 1 year ago. All parties have done consistently with the exception of the appellant.

Kindly,

Donna Moore- pro se respondent/ heir.

On Monday, November 4, 2024, Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)> wrote:

Dear Clerk of the Court,

I am writing to clarify inaccuracies in Ms. Donna Moore's recent statement regarding her receipt of court filings and to request that she provide an updated address on the record.

To begin, Ms. Moore has not filed an official appearance in the Court of Appeals, nor did she register her appearance or participate in the appeal process in the circuit court. As such, she has not formally engaged in the appeal process and has not followed the requirements for receiving notices on appeal matters.

Although Ms. Moore waived her right to official service, I have been sending her copies of filings by mail as a courtesy. Additionally, she has been receiving all court-related filings via email, which she designated as her primary communication method in this case.

The amended notice of appeal was filed on the evening of Friday, November 1, 2024,

and an email copy was promptly served upon Ms. Moore. A physical copy was also mailed, which she should receive within a few days.

Furthermore, Ms. Moore has not submitted any documentation to update her address on the record, nor has she responded to any filings despite having knowledge of them. Since 2020, her only filing has been her waiver of notice of hearings. For reliable mail delivery and proper notification, it is essential that Ms. Moore provide her current address. Having an updated address on file will support efficient and verifiable delivery of all mailed documents.

Thank you for your attention to this clarification. I remain committed to following court procedures and will continue to ensure that all filings are provided to involved parties as required by court rules.

Sincerely,

Dorothy Pierce

On Mon, Nov 4, 2024 at 2:22 PM Donna Moore <[75dmoore@gmail.com](mailto:75dmoore@gmail.com)> wrote:

Madame Clerk,

For the record. I will reiterate as I did before. I, Donna Moore never received the first appeal via usps mail that was submitted. I have not received filings from Dorothy Pierce in quite some time that I am an included in via usps mail.

I do receive any filings/ responses from Mr McDuff via usps mail.

I will advise the court if newest filing is not received.

Donna Moore-pro se/ respondent/heir

On Monday, November 4, 2024, Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)> wrote:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Sent:** Friday, November 1, 2024 6:40 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Rick McDuff <[rick@mjmlawsc.com](mailto:rick@mjmlawsc.com)>; Donna Moore (via Google Docs) <[75dmoore@gmail.com](mailto:75dmoore@gmail.com)>  
**Subject:** Second Amended Notice of Appeal- Case: 2024-000455

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**Clerk,**

Please find the attached document for filing. Respondents have been copied on this email as a courtesy, and a hard copy will be mailed to their respective addresses.

Thank you.

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**DOROTHY PIERCE**

**Justice is not a Privilege but a Fundamental Human Right.**

**"TRUTH is TREASON in an EMPIRE of LIES"**

**[750 Mourning Dove Lane, Seneca, SC.29678](#)**

**Tel: 864-324-3247**

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**DOROTHY PIERCE**

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