

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Circuit Court

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

In the Matter of: Estate of Thomas G. Moore

RECEIVED
NOV 28 2018
SC Court of Appeals

Michael Dennis Moore,.....Appellant,

v.

Thomas Paul Moore, et al,.....Respondent,

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

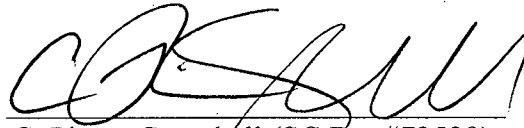
In addition to the items listed in Respondent's Designation of Matter to Be Included in the Record on Appeal filed on or about October 31, 2018 in the South Carolina Court of Appeals, Respondent Thomas P. Moore designates the following matter for the record on Appeal:

1. Order of the Honorable J. Munford Scott, Jr., dated November 28, 2016.
2. Transcript of Hearing before Probate Judge J. Munford Scott, Jr., dated December 22, 2015, pp. 20-23; 49-51; 70; 86-136; 156-165; 166-172; 175-185; 187-189; and 194-195;
3. Transcript of Hearing before Probate Judge J. Munford Scott, Jr., dated July 27, 2016, pp. 15; 21-24; 29; 33-49; 53-61; 63-65; 70-90; and 93;
4. Exhibits 4, 18, 20, 21, and 22 introduced at Probate Hearing dated December 22, 2015;

5. Exhibit 1 of Respondent Thomas P. Moore, and Exhibits 1-7 of Respondent Phillip Moore, introduced at Probate Hearing dated July 27, 2016.

Counsel for Respondent certifies that this Designation of Matter contains no matter that is irrelevant to this appeal.

November 28, 2018
Florence, SC



C. Pierce Campbell (SC Bar #72539)
Turner, Padgett, Graham & Laney P.A.
P.O. Box 5478
Florence, SC 29502
Phone: (843) 656-4429
Fax: (843) 413-5837

ATTORNEYS FOR RESPONDENT
THOMAS P. MOORE

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Circuit Court

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

In the Matter of: Estate of Thomas G. Moore

Michael Dennis Moore,.....Appellant,

v.

Thomas Paul Moore, et al,.....Respondent,

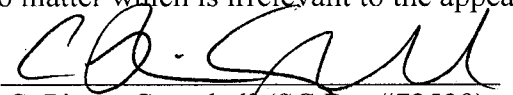
RECEIVED
NOV 28 2018
SC Court of Appeals

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

ATTORNEY'S CERTIFICATION

I, the undersigned attorney for the Respondent, certify that the Designation of the Matter to be Included in the Record on Appeal contains no matter which is irrelevant to the appeal.

November 28, 2018
Florence, SC


C. Pierce Campbell (SC Bar #72539)
Turner, Padgett, Graham & Laney P.A.
P.O. Box 5478
Florence, SC 29502
Phone: (843) 656-4429
Fax: (843) 413-5837

ATTORNEYS FOR RESPONDENT
THOMAS P. MOORE

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Circuit Court

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

RECEIVED
NOV 28 2018
SC Court of Appeals

In the Matter of: Estate of Thomas G. Moore

Michael Dennis Moore,.....Appellant,

v.

Thomas Paul Moore, et al,.....Respondents,

BRIEF OF RESPONDENT THOMAS PAUL MOORE

CERTIFICATE OF SERVICE

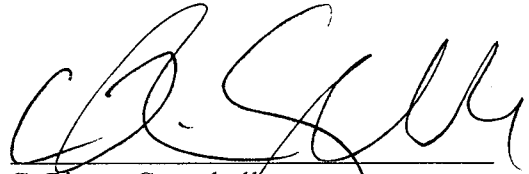
I certify that I have served the Initial Brief of Respondent Thomas Paul Moore, Designation of Matter to be Included in the Record on Appeal, Certification, and Certificate of Service on November 28, 2018, via hand-delivery to the Deputy Clerk, South Carolina Court of Appeals, 1220 Senate Street, Columbia, SC 29201 and by depositing a filed-stamped copy of same in the United States Mail, postage prepaid, addressed to the following:

Norwood DuRant, Jr., Esquire
Law Offices of N. David DuRant
P.O. Box 14722
Surfside Beach, SC 29587
Attorney for Appellant

James R. Snell, Jr., Esquire
Vicki Koutsogiannis, Esquire
Law Office of James R. Snell, Jr., LLC
123 Harmon Street
Lexington, SC 29072
Attorney for Phillip Frederick Moore

Linda K. Moore
1454 Golf Terrace Blvd.
Florence, SC 29501

Francine L. Lawhon
2005 Third Loop Rd.
Florence, SC 29501



C. Pierce Campbell
Turner, Padgett, Graham & Laney P.A.
P.O. Box 5478
Florence, SC 29502
Phone: (843) 656-4429
Fax: (843) 413-5837
ATTORNEYS FOR RESPONDENT
THOMAS P. MOORE

Turner | Padget

C. Pierce Campbell

REPLY TO:

E-Mail: PCampbell@TurnerPadget.com
Writer's Direct Dial: (843) 656-4429
Writer's Direct Fax: (843) 413-5837

November 28, 2018

Via Hand-Delivery

The Honorable Jenny Abbott Kitchings
Deputy Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
NOV 28 2018
SC Court of Appeals

Re: Michael Dennis Moore v. Thomas Paul Moore, Francine Laura Lawhon, Linda Kay Moore, and Phillip Frederick Moore
Appellate Case No.: 2018-001144
TPGL File No.: 13272.101

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the following for filing in the above case:

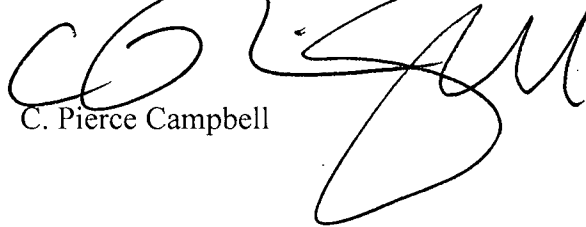
1. Initial Brief of Respondent Thomas Paul Moore;
2. Designation of Matter to be Included on the Record;
3. Attorney's Certification; and
4. Certificate of Service.

South Carolina Court of Appeals
November 28, 2018
Page 2

Please file the original with the Court and file-stamp the copy for us and return same in the enclosed, prepaid, self-addressed envelope. We are serving a filed copy of the Brief on all parties of record via United States mail. Thank you for your assistance in this matter.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.



C. Pierce Campbell

CPC/met
Enclosures

cc(w/enc): The Hon. J. Munford Scott, Jr.
Norwood D. DuRant, Jr., Esq.
James R. Snell, Jr., Esq.
Thomas P. Moore
Francine M. Lawhon
Linda K. Moore