

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.

Linda Kaye Moore, Francine Laura Lawhon, Respondents.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents Francine Laura Lawhon, Linda Kaye Moore,
designates the following matter for the record on Appeal:

The Probate Court erred in ruling on the Richland County Property Issue. 4 of the 5 Heirs will make their Pleas to the South Carolina Court of Appeals to Reverse (ONLY) the Order on the Richland County Property and return the Issue back in Probate to be settled by all 5 Heirs to be carried out by the Will and our Parents wishes. The facts, findings and testimony in the transcript from the Dec. 22, 2015 Hearing will prove this letter NEVER EXISTED until the day of the Dec. 22, 2015 Hearing when submitted by Pierce Campbell and Thomas Moore. The remaining 4 Heirs were shocked and taken by surprise that Pierce Campbell and Thomas Moore waited two years into the Probate to submit this illegal, undated, unsigned letter the day of our 1st Hearing Dec. 22, 2015. Our Parents would NEVER give anyone a letter like this.

1. Order of the Honorable J. Mumford Scott, Jr., dated November 28, 2016. = Only concerning the Richland County Property influenced by Lies and False Statements by Pierce Campbell and Thomas Moore.
2. Transcript of Hearing before Probate Judge J. Mumford Scott, Jr., dated December 22, 2015, = pages 53, 58, 65, 74, 161, 162, 163, 164.

3. **Exhibit introduced at Probate Hearing dated December 22, 2015;** - Copy of the undated, unsigned letter Pierce Campbell and Thomas Moore waited 2 years INTO the Probate to submit the day of our 1st Hearing Dec. 22, 2015.

4. **Exhibits** - 15 copies of our parents original letters found in their files after T.G. Moore passed away Dec. 20, 2013 were Certified Mailed to Circuit Court in Florence, S.C. to compare to the letter Pierce Campbell and Thomas Moore submitted. We were told ALL 15 copies were mis-placed or lost. On page 163 in the transcript, Thomas Moore testifies our parents give him this letter in early 2000. Searching our parents files again, we have (Enclosed) original letters our Parents gave in Early 2000 to compare with Thomas Moore's letter.

5. **Exhibit** - (Enclosed) is a copy of the Date Oct. 2, 2015 we had a Deposition before the Dec. 22, 2015 HEARING. The purpose of this Deposition was to dis-close ALL evidence and documents with each other on ALL issues to be presented in the Dec. 22, 2015 Hearing. Pierce Campbell and Thomas Moore did NOT mention or dis-close anything about this letter at the Deposition Oct. 2, 2015. They waited to AM BUSH everyone the day of the Dec. 22, 2015 Hearing with this Letter. Again, 4 of the 5 children will testify under oath, our Parents did NOT type this Letter. Someone typed this letter or Thomas Moore Typed it Himself.

Respondent's certifies that this Designation of Matter contains no matter that is irrelevant to this appeal.

Jan. 9, 2019
 Florence, S.C.

Pro-SE HEIRS

Francine L. Lawhon
 Linda K. Moore
 3401 Chantz Ct.
 Florence, SC 29501

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RESPONDENTS CERTIFICATION

I, the undersigned Respondents, certify that the Designation of the Matter to be included in the Record on Appeal contains no matter which is irrelevant to the appeal.

JAN. 9, 2019
FLORENCE, S.C.

PRO-SE HEIRS

Francine L. Lawhon
Linda K. Moore
3401 Chantz Ct.
Florence, SC 29501

REPLY TO:

Francine L. Lawhon
Linda K. Moore
3401 Chantz Ct.
Florence, SC 29501

JAN. 9, 2019

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

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JAN 14 2019

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

Dear Ms. Kitchings:

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

1. Initial Brief of Respondents;
2. Designation of Matter to be Included on the Record;
3. Certification;
4. Certificate of Service.

South Carolina Court of Appeals

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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 United States mail. Thank you for your assistance in this matter.

Sincerely,
Francine L. Lawhon
Linda K. Moore

Enclosures

cc(w/enc): **C. Pierce Campbell, Esq.**
Norwood D. DuRant, Jr., Esq.
James R. Snell, Jr., Esq.
Thomas P. Moore
Francine M. Lawhon
Linda K. Moore
Phillip Frederick Moore
Michael Dennis Moore

110-52 News
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Florence, S.C. 29501

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JAN 14 2019

SC Court of Appeals

Honorable Jenny Abbott Kitchings
Deputy Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, S.C. 29201