

Michael Dennis Moore
2129 Kristen's Channel
Florence, S.C. 29501

Phone 843-245-3893

Email: Palmetto Cars@outlook.
Com

Honorable Jenny Abbott Kitchings

Ms. Kitchings:

I Dennis Moore sending you some more paperwork
I would like for you to look at with Case Number:
2018-001144. IF there is any charge or cost please
Email the Bill or send it to the address ABOVE.
And I will forward a check back to you.

Thank You
Dennis Moore

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APR 11 2019
SC Court of Appeals



The South Carolina Court of Appeals

4-7-19

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211
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COLUMBIA, SOUTH CAROLINA 29201
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FAX: (803) 734-1839
www.sccourts.org

Jenny Abbott Kitchings

Attn: Ms. Kitchings

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APR 11 2019

SC Court of Appeals

If you would, please attach this paperwork
to the South Carolina Court of Appeals In
the Matter of the Estate of Thomas G.
Moore, County of Florence, SC 29501.

Case No: 2018-001144

Probate Court

Case Moore Vs Moore

MOORE

3401 Cresty Court

Florence, SC 29501

COLUMBIA SC 290

24 JUL 2017 FM 11

D. Moore

2129 Kristen Channel

Florence, S.C. 29501

29501-894629

Read Page 3

IS that Legal For Someone
to go in a Judge Chamber to
discuss a case in private

And the Judge Agreed
With him. And you telled me
that Legal.

David or Woody You Should get Dennis moore a New Trial

this helps you and her children do not care if she lives or dies, all of you need to stop and think what can happen to you in the future and say why did this happen to me. AT 54 years old Lamar has to lay in bed and be washed, Fed & cannot walk by himself, I tried to talk to him all the time he would for me, not to do the wrong things he was doing. Oh, by the way Linda thinks you did her a favor when you bought her a car & a condo, but what she don't understand you used our money from the estate that you are controlling and trying to steal again I am no dumb Ass, I will admit, we dodged a bullet in the last hearing that Judge Scott was going to close the probate that day, you would have come out smelling like a rose if I had not went in Judge Scott's office I explain to him I don't think he could close this Probate until these loans to Tommy Jackson and loans to Money Co LLC was submitted to him. He agreed.

Mr. T. P. Moore,
 I should have let Judge Scott close the probate that day with us getting \$110,000.00 to split 5 ways instead of - Phillip Moore NOT you or anyone else with these loans and checks, Judge Scott has ordered

Ms. Jenny is this Legal

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APR 11 2019

SC Court of Appeals

Page ①

The South Carolina Court of Appeals

Honorable Jenny Abbott Kitchings

Att: MS. Kitchings

4-7-19

Case Number: 2018-001144

MS. Kitchings I had NO Ideal that you
Where Attorney Well then you know all about
the laws of South Carolina what you can do
and what is legal or not legal. My question to
you MS. Kitchings what are the consequences
for a Judge or Attorney not Recusing themselves
over a particular case when there where proper
grounds to do so. IF there NO state law or
Federal Law in South Carolina againts this then
someone in the State House needs to change the
laws because it is dead wrong for two people from
the same law firm to rule on your case how do you
expect to win a case like that someone should
be suspended or disbarment for there actions.

Now its time for you to act or the South Carolina
Court of Appeals on this case because if that
the way that our courts or set up today
well then God Bless us all because thats
nothing but a scam or fraud with in our system.
NO Body should be above the law I thought
that was the Reason we have courts.

COPY

4-7-19 Page 2

My thing is C. Pierce Campbell With Turner, Padgett, Graham, & Laney P.A. Said in his Final Brief OF Respondent on page Number 12 there Was Nothing unFair occurred.

Now What Mr. Campbell is saying every thing that him and the Judge done Was Fair and its not unlegal and they did not Break No South Carolina Rules or laws. Did they even take the oath to uphold the laws. IN my case (NO) Ms. Jenny here are the Facts Where they againts the law or not I dont know because I pennis moore is not no Attorney but you are.

① Did Cal Pierce Campbell the Attorney For the Respondent and the Probate Judge J. Munford Scott JR. Break eney laws or Rules With Both OF them From the Same lawFirm. Would you Ms. Jenny Called that a (ConFliet OF INterest) that seems as it Would also be (biased) and unFair to the other party. Not to mention at one time Both OF them Where Shareholder in the Same lawFirm also SO Ms. Jenny you know there Was a personal Connection betwin the two OF them With in this Case.

SO you got ConFliet OF INterest and Biased.

COPY

4-7-19

Page 3

② Ms. Jenny also I would like to know from you is it legal for the other side to go in the Judge J. Munford Scott, JR. Chambers on several occasions and talk to him personally with out a Attorney present. I am sending you a copy of the letter where my brother sayed in went into Judge Scott Chambers and the Judge agree what he had told him.

Please read the letter

③ Ms. Jenny is it also legal for a Judge and the oppose Attorney to take something away from you when it belong to my Father Thomas Gaddy Moore and it was suppose to be in the estate. This Judge rule in Mr. Cal Pierce Campbell favor and said that his client could get the Church property. Mr. Campbell had some letter that somebody wrote or type and it was not sign by my Father or no one else. Is it legal to take something from someone else and give it to the other person. When they dont have no legal papers.

④ And is it also legal for a Judge wait until the final day of the Ruling and aloud the one on the other side to bring in new evidendence's on the final Day. Well this Judge aloud it to happen did not give I Dennis Moore or my Attorney to even view what they had in that Bag. (Fraudulent Act)

COPY

4-7-19

Page ④

⑤ Ms. Jenny how can a Judge charge you for a crime that never happen this Judge charge I Dennis Moore \$454,640.00 dollars for checks he said I received from my father and put it in my business. Moores Cars LLC. The checks the Judge rule on and said I got the checks where not made pay to the order of Dennis Moore the checks was never sign by Dennis Moore on the front or back they were never deposit in Moores Cars LLC Dennis Moore Account or they were never deposit in my personal Account but this Attorney and Judge from the same law firm is going to charge Dennis for something that never happen you know if I Dennis Moore put the money in my own Account there got to be a deposit slip and I had to sign the back of the checks for me to put it in my Account. Ms. Jenny IF you can show me where Dennis Moore sign the back of the checks or that the checks were made to me or I deposit it in my own account well you going head and send me to jail. Because I know what I done and I don't care what that Judge and Attorney said its not so. My father Thomas Gaddy Moore made them checks to him and he sign the back of them also and put the checks in his Account Moores Cars LLC and Not Dennis Moore Account. He took the money out of one of his Account and loan it to the other Account Dennis had nothing to do with that.

COPY

4-7-19 Page 5

All the Attorneys said there was no way that I Dennis Moore could have got a Fair trial All OF my Attorneys said them SELF that I Was railroaded and ambushed buy the good old Boys From the Same law Firm. Every thing that Mr. Campbell ask For he got it throw his parter at the Same law Firm. When there where 4 more law Firms invokd and they could not come up with nothing so Right there that should telled you something Not Right With this Case. NO Body even the Attorneys dont wont to talk about what really happen in this Case they Just wont to talk ABOUT the way the Judge rule went him and the attorney has been Crooked the hole Time and Both OF them never mention one word to NO Body that they Where From the Same law Firm. IF they would have said something about they Where From the Same law Firm Dennis Moore would have never let him rule on my Father Estate because I Know I could Never get a Fair trial. Ms. Jenny you are a Attorney how would you like it if one OF your Family member went to Court and had to Face a Attorney and a Judge From the Same law Firm they Just thought they could get buy with it and never get Caught but one thing about it the INternet dont lie.

COPY

4-7-19 Page 6

My question to you Ms. Jenny IF you won a Case Fair and the Judge rule you could get 699,000 thousand Dollars and there was no kind of Scam or Fraud Why would you pick up the phone and called Dennis Moore Attorney David Smith the next week and telled my Attorney David Smith to telled Dennis Moore this is Mr. Campbell speaking that I will drop all the charging againsts Dennis IF Dennis would let my client have his part of the estate.

Now that's sound like a bribe to me if I Dennis Moore give my money that my Father left me to his client Mr. Campbell will drop all the charging, And also would this Case be Fraud intentional Misrepresentation of material existing Fact made by one person the Judge to another with the Attorney knowledge of its Falsity and for the purpose of inducing the other person to Act. And which the other person Dennis Moore relies with resulting injury or damages.

My Father Thomas Caddy Moore had nothing in his Will that I Dennis Moore owe the estate one dime. They have NO Legal documents or Nothing From my Father to Support there claim And if they have something From my Father Where I owe the estate money Please Show it to me. Dennis Moore

TURNER PADGET G. LANEY P.A.

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

C. PIERCE CAMPBELL

REPLY TO: Florence Office
E-mail: pcampbell@turnerpadget.com
Writer's Direct-Dial: (843) 656-4429
Direct Fax: (843) 413-5837

August 25, 2014

CERTIFIED MAIL
RESTRICTED DELIVERY
RETURN RECEIPT REQUESTED

Mr. Dean Goewey
Registered Agent, Anderson Brothers Bank
101 N. Main St.
Mullins, SC 29574

RE: In Re Estate of Thomas G. Moore
Florence County Probate Court: 2014-ES-21-134
File No: 13272.00101

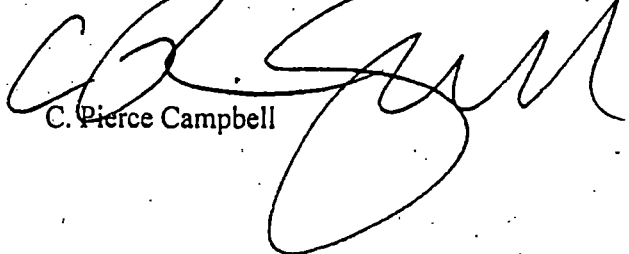
Dear Mr. Goewey:

Please find enclosed a Rule 45 subpoena for copies of all documents requested therein, which are in your possession. You will note that this subpoena is for the requested documents only and not for you personally. We will, of course, reimburse you for expenses for providing these documents. If you anticipate that the cost for producing these records will exceed \$75.00, please contact me prior to copying the documents. Thank you for your assistance in this matter.

Please feel free to contact me if you have any questions or if I can be of assistance in any way.

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



C. Pierce Campbell

CPC/cei
enclosures
cc: Porter Stewart, Esq.
Thomas P. Moore

*When Mr. Campbell Subpoena
my Father checks he knew
himself that Dennis moore did
not get that money. He had copies
of the checks.*

STATE OF SOUTH CAROLINA)

IN THE PROBATE COURT

COUNTY OF FLORENCE)

CASE NO.: 2014-ES-21-134

Phillip F. Moore, Sr.,)

Petitioner,)

Vs.)

Michael Dennis Moore, in his capacity)
as Personal Representative of the)
Estate of Thomas G. Moore,)

Respondent.)

ORDER

2014 JUL -2 AM 10:22

This matter is before the Court upon the filing of a Summons and Petition. The Petitioner seeks the removal of the Personal Representative of the Estate of Thomas G. Moore. The Petitioner also seeks to be appointed as Personal Representative of the Estate of Thomas G. Moore and seeks to have a restraining order issued restraining the sale or incurring of debt or assets of Moore's Cars, LLC. A Temporary Hearing was set on May 6, 2014. The Respondent was properly served with the Summons and Petition. Appearing at the Hearing was the Petitioner, Thomas Paul Moore, an heir, Linda Moore, an heir, the Respondent and his attorney, S. Porter Stewart, II.

At the call of the case for the hearing for a Temporary Restraining Order, the attorney for the Petitioner advised the Court that a Subpoena had been issued to the Decedent's accountant and a review of those records indicated that the assets which the Petitioner sought to restrain from disposal or indebtedness in fact were not assets of the estate. The Petitioner therefore withdrew his request for a temporary restraining order as to Moore's Cars, LLC.

The attorney for the Respondent advised the Court that there was an offer of sale for the real property located at 2125 Kristens Channel Road, Florence, South Carolina for Four Hundred Forty-five Thousand Dollars and 00/100 (\$445,000.00). All present in the Courtroom consented to

TRUE COPY
J. Porter Stewart
Judge Florence County Probate Court

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

COPY

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

C. Pierce Campbell

REPLY TO:

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

October 10, 2014

S. Porter Stewart, II, Esquire
McGowan Rogers Stewart Hiller & Krize, P.A.
P.O. Box 1461
Florence, SC 29503

Re: Estate of Thomas G. Moore
TPGL File No.: 13272.101

Dear Porter:

Please allow this letter to serve as an update on this position of my client, Thomas P. Moore, related to this estate. In an effort to be conciliatory and to encourage the prompt completion of the administration of this estate, my client will not be seeking to remove the Personal Representative at this time. Our hope is that this will allow the Personal Representative to quickly and appropriately conclude all of the business of the estate and make the necessary distributions. There are a few items which I request of the Personal Representative, which have been previously discussed. I hope that these are acceptable to you.

The first item is to file an amended inventory. There was an account at First Citizens Bank in the approximate amount of \$7,000. This was an estate asset and was closed after Mr. Moore's death by your client. I believe this account should be listed. Further, your client informed the other estate beneficiaries of cash he retrieved from Mr. Moore's safe. I believe the amount was approximately \$14,000. Please have this cash and account listed on the estate inventory and accounted for when he files his accounting.

The second item is to repeat our request that the claims made against the estate which relate to the conduct of the business of Moore's Cars, LLC be denied. If the business is not an estate asset, no claims related to the business should be made against the estate. Please have the Personal Representative handle these from business accounts.

TPGL 6004692v1

*Mr. Campbell said in 2014 the
Business is not an asset of the
Estate.*

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entirely inappropriate. As such, this Court is limited to the factual findings below. The evidence overwhelmingly supported the factual findings and no contrary evidence or testimony was presented, nor has it been argued here.

Further, Appellant claims that "copies of checks" were not provided to him in advance of trial and thus such evidence should be excluded.⁷⁴ This is a red herring and does not entitle the Appellant to relief for several reasons. First, and most importantly, the issues of the non-collection of the loan to Tammy Jackson and sale of the Jaguar were raised at the December 2015 hearing, not the final hearing the following July.⁷⁵ It was only at the July hearing that new checks were presented and Appellant asked to be able to respond by a "counter summary."⁷⁶ As such, there is no argument being presented here that goes to the court's findings on the Mercedes sale or the failure to collect the Tammy Jackson loan. On that basis alone, this Court should affirm the lower court rulings as to the Jaguar sale and failure to collect the Tammy Jackson loan.

Further, the timing of the production of the checks is not prejudicial because Appellant failed to request such documents through discovery. No written discovery was exchanged between the parties. Limited depositions were taken, and some documents were exchanged voluntarily. However, none of the parties submitted Requests for the Production of Documents to the others. ~~Appellant's failure to do so and then face surprise at trial was a risk that he took in conducting the litigation. Nothing unfair occurred. The Appellant simply took a risk and then did not like the outcome when the risk failed to pay off. Exclusion of evidence through Rule 403, SCRE is not for this purpose.~~

⁷⁴ Appellant's Br. 11-12, Oct. 31, 2018.
⁷⁵ R. pp. 49-95-pp. 162-256.
⁷⁶ R. p. 254.

*Mr. Campbell really beleave
there was Nothing unFair occurred.*

00021

00028

FedEx Package
Express US Airbill

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09597

fedex.com 1.800.GoFedEx 1.800.463.3339

06046020

1 From
Date 4-10-11
Sender's Name Danni Moore Phone 843 245-3893
Company PALMETTO CARS OF FLORENCE LLC
Address 2222 W PALMETTO ST
City FLORENCE State SC ZIP 29501-4047

2 Your Internal Billing Reference

3 To
Recipient's Name Jenny Abbott Kitchens Phone 803 934-1149
Company SC Court of Appeals Clerk of Court
Address 1220 Senate St.
City Columbia State SC ZIP 29101-1000



8102 7854 1076

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Form ID No 0215

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5 Packaging *Declared value limit \$500.
 FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
 No Signature Required
 Direct Signature
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Does this shipment contain dangerous goods?
 No Yes
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7 Payment Bill to:

Sender Recipient Third Party Credit Card Cash/Check
Total Packages Total Weight

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