

7-16-19

# The South Carolina Court of Appeals

In the Matter of the Estate of Thomas G. Moore:

Michael Dennis Moore, Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon, Linda  
Kaye Moore, and Phillip Frederick Moore, Respondents.

Appellate Case No. 2018-001144

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

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JUL 18 2019

SC Court of Appeals

Dear Ms. Kitchings

- ① I, Phillip F. Moore sold the house at 3401 Chantz Court Florence, S.C. 29501. Please change my address in the South Carolina Court of Appeals to: Phillip Fredrick Moore 1504 Pamon Drive Florence, S.C. 29505.
- ② As I stated in my last letter, I am now Pro-SE. Please send all Correspondences and letters to my new address: Phillip Fredrick Moore 1504 Pamon Drive Florence, S.C. 29505 Not TO James R. Snell.
- ③ Linda K. Moore has passed away and the only Heirs left as Pro-SE's will be Phillip F. Moore and Francine Laura Lawhon.
- ④ Please submit the enclosed letters to the South Carolina Court of Appeals Judges?

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In the Matter of the Estate of Thomas G. Moore:

Michael Dennis Moore, Appellant,

v.

Thomas Paul Moore, Francine Laura Lawton, Linda Kaye Moore, and Phillip Frederick Moore, Respondents.

Appellate Case No. 2018-001144

JUL 18 2019

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TO: The South Carolina Court of Appeals Judges,

Enclosed are two letters that has devastated 3 of the 5 Heirs - Phillip Friedrich Moore, Francine L. Lawton and Linda K. Moore (deceased). Pierce Campbell has succeeded through his Law Books to dismiss and strike the briefs of Phillip F. Moore, Francine L. Lawton and Linda K. Moore. The fact is Phillip F. Moore, Francine L. Lawton and Linda K. Moore were present through-out the Dec. 22, 2015 Hearing on the Richland County Property Issue listening to the Lies of Pierce Campbell and Thomas P. Moore's testimony to Judge Scott about the undated, unsigned letter, the Will and the safe. The remaining 4 Heirs were totally surprised with this letter the day of the Hearing. We could not stand up and make a scene in Court hearing the Lies by Pierce Campbell and Thomas P. Moore. Our attorneys were also ambushed by this letter and the only thing they could do that day in Court was to Object. These briefs submitted by Phillip F. Moore, Francine L. Lawton and Linda K. Moore to the South Carolina Court of Appeals on the Richland County Property were (solely) from the Dec. 22, 2015 Hearing. Thomas P. Moore proves (himself) stated in the transcript the Lies he told through-out the Richland County Property Issue with his testimony at the closing of the Richland County Property Issue. Please read the transcript of testimony on the Richland County Property Issue from the beginning to the end. Due to the fact that our briefs were

7-16-19

Dismissed and stricken at the request of Pierce Campbell, we have nothing on the docket for the Judges to review. After this letter we will not be writing anymore letters taking up your time.

Lastly, could we please ask the Judges to give us a response to the papers that were submitted June 18, 2019 if they will be reviewed on the docket. The Correspondence submitted June 18, 2019 is NOT Considered A Brief. These papers ONLY state our opinion and our facts we received from the Dec. 22, 2015 Hearing. As Heirs of our parents Estate we ask that we have something on the docket for the Judges to Review to make their decision. Again, the papers submitted June 18, 2019 is Not a Brief. Please respond with a letter if these papers submitted will be reviewed. We are not attorneys and do not claim to be, if you would please excuse these hand-written letters submitted to the S.C. Court of Appeals. We are common ordinary people that knows nothing about the process of our Court System. We have been involved in this Probate entering the 6<sup>th</sup> year and it would be heart-breaking to be out completely.

P.S. - We pray that this Probate will soon close.

Thank you for your time,  
Phillip F. Moore  
Francine L. Lawson  
1504 Pamen Drive  
Florence, S.C. 29505

STATEMENT OF ISSUES ON APPEAL

II. Did the lower courts err in ruling that a contract to sell real property extinguished the rights of survivorship of the Appellant, the joint tenant with rights of survivorship, when the Testator, the deceased joint tenant died after the signing of a contract to sell real property, but before the closing and recording of the transfer of Deed?

III. Did the circuit court err in ruling that the Appellant did not preserve the issue for review of prejudicial submission of evidence and allowance of additional claims the day of trial, when counsel for the Appellant did not object to evidence and claims at time of submission but later requested the ability to respond to Respondents allegations and submission of evidence, but was denied the opportunity by the Probate Court?

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I. Did the lower courts err in applying the doctrine of integration, where alleged integrated document was a separate envelope containing a document with instructions devising a piece of the Testator's estate and no evidence or testimony from attesting witnesses spoke as to the validity of the document or the presence of the document at the time of the signing of the will?

Our Opinion →

This issue ~~should~~ <sup>↓ ↓ ↓ ↓ ↓</sup> NOT have been presented to Judge Scott for his decision. ALL 5 Heirs made a Promise and agreement together at the meeting 7 days AFTER T.G. Moore's funeral, how the Richland County Property will be settled. ALL 5 Heirs AGREED Before Probate OPENED. It was unfair to the remaining 4 Heirs that Thomas P. Moore decided to break his Promise and agreement. 4 of the 5 Heirs will ask that the issue on the Richland County Property be settled by their Agreement they made Before the Probate OPENED.



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

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May 22, 2019

Mr. James Ross Snell, Jr., Esquire  
123 Harmon Street  
Lexington SC 29072

Ms. Vicki D Koutsogiannis, Esquire  
123 Harmon Street  
Lexington SC 29072

Re: In the Matter of the Estate of: Thomas G. Moore  
Appellate Case No. 2018-001144

Dear Counsel:

We received your motion for extension of time to serve and file the respondent's final brief as well as the respondent's final brief of Phillip Frederick Moore. As per this Court's order dated April 10, 2019, the respondent's initial brief of Phillip Frederick Moore was stricken by this Court, and will not be considered on the docket. Therefore, this Court declines to accept the respondent's final brief of Phillip Frederick Moore. Please contact this Court within ten (10) days from the date of this letter if you wish to make arrangements to retrieve the original and bound copies of the respondent's final brief of Phillip Frederick Moore. This Court will dispose of the original and bound copies of the respondent's final brief of Phillip Frederick Moore if no arrangements are made within ten (10) days from the date of this letter.

*This was done by Pierce Campbell's request.  
These briefs prove the lies stated  
by Pierce Campbell and Thomas P. Moore  
on the Richland County Property issue.*

# The South Carolina Court of Appeals

In the Matter of the Estate of Thomas G. Moore:

Michael Dennis Moore, Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon, Linda  
Kaye Moore, and Phillip Frederick Moore, Respondents.

Appellate Case No. 2018-001144

The Honorable J. Munford Scott, Jr.,  
The Honorable Thomas A. Russo  
Florence County  
Trial Court Case No. 2016CP2103062

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## ORDER

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Respondent Thomas Paul Moore has filed a motion to serve and file a brief in response to briefs filed by Linda Kaye Moore and Francine Laura Lawhon. This Court issued an order dated April 10, 2019, striking the briefs of Linda Kaye Moore and Francine Laura Lawhon. Therefore, this motion is now moot. No further action will be taken on this motion.

*This was done by Pierce Campbell's request. These briefs prove the lies stated by*

Pierce Campbell and Thomas P. Moore on the Richland County Property Issue.

FOR THE COURT

BY

*V. Claire Allen, Deputy*  
CLERK

**FILED**

*July 9, 2019 s.s.*

Phillip Fredrick Moore  
1504 Paman Drive  
Florence, S.C. 29505

Honorable Jenny Abbott Kitchings  
Deputy Clerk S.C. Court of Appeals

1220 Senate Street

Columbia, S.C. 29201

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SC Court of Appeals

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