

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

9-24-19

APPEAL FROM FLORENCE COUNTY  
CIRCUIT COURT

Thomas A. Russo, Circuit Court Judge

**RECEIVED**

SEP 26 2019

SC Court of Appeals

APPELLATE CASE NO. 2018-001144

IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)

Michael Dennis Moore .....Appellant,

v.

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

PRO-SE RESPONDENTS  
PHILLIP F. MOORE  
FRANCINE L. LAW HON  
LINDA K. MOORE-DECEASED

9-24-19

# 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.

**RECEIVED**

SEP 26 2019

SC Court of Appeals

Appellate Case No. 2018-001144

TO: Judges in the South Carolina Court of Appeals,

Please, close this Probate. 3 of the 5 Heirs - Phillip F. Moore, Francine Lawhon and Linda Moore, has been through 5 years of Pain and suffering being Honest and Truthful defending their Parents Probate exactly by their wishes stated in the Will. The 3 of us are retired receiving Social Security. We have spent thousands of dollars from our retirement funds in this Probate since Feb. 2014. We did not believe the Probate would be open as long as it had and we have depleted most of our retirement funds. There is NO Doubt in our minds this Probate would have closed in eight months without wasting the Courts and Judges time if not for our 2 Brothers Michael Dennis Moore, Thomas P. Moore and their attorneys. Our 2 brothers - Michael Dennis Moore, Thomas P. Moore and ALL their attorneys has tried everything they could to take away our parents Estate from the other 3 Heirs.

(1) Enclosed is copies of 2 checks that Dennis Moore wrote and used a signature stamp Dennis made to sign Thomas G. Moore's name. These 2 checks were wrote with Dennis Moore's hand - writing and stamped when T.G. Moore was in a coma and when T.G. Moore passed away. Dennis used the signature stamp in ALL of T.G. Moore's accounts. T.G. Moore was admitted in the Hospital 12-12-13, T.G. Moore went into a Coma 12-13-13 and passed away 12-20-13. These 2 checks are dated 12-19-13.

(2) Enclosed is a letter Pierce Campbell and Thomas P. Moore submitted the day of the Dec. 22, 2015 Hearing. This letter did not have our parents signature or anyone elses signature. The remaining 4 Heirs will NEVER believe this letter is Legal and should NOT have been admitted through our Court system. Two years into the Probate Thomas P. Moore had this letter in his possession and Pierce Campbell ambushed the other 4 Heirs the day of the Dec. 22, 2015 Hearing with this letter. The testimony in the Dec. 22 2015 Hearing will prove the letter never existed with or near the Will.

(3) The fact is it is proven in the transcript of the Dec. 22, 2015 Hearing Pierce Campbell and Thomas Moore lied and made false statements about the letter. The truth is the Briefs submitted to the South Carolina Court of Appeals by Phillip F. Moore, Francine Lawler and Linda Moore stated the true facts about this letter from the testimony in the Dec. 22, 2015 Hearing. It was these briefs that upset Pierce Campbell to make a Motion to the S.C. Court of Appeals to have the Briefs Rejected. We would like to ask that the briefs of True Facts submitted to the South Carolina Court of Appeals be put back on the docket to be reviewed by the Judges. Lies and speculations were told by Pierce Campbell for his client Thomas P. Moore to take the \$350,000.00 Richland County Property away from the other 4 Heirs. As attorney Kathy Elmore and David Smith stated in the Hearing - IF T.G. Moore wanted the Richland County Property to go to Thomas P. Moore, "HE WOULD HAVE STATED IT IN THE WILL". We would ask the S.C. Court of Appeals Judges - Please be Fair and Return ONLY the Richland County Property back to the 5 HEIRS.

(4) Enclosed - Defending her parents Estate from her 2 brothers - Michael Dennis Moore and Thomas P. Moore who has become thieves for 5 years, Linda H. Moore has passed away without receiving a penny from her parents 2 million dollar Estate. Which Elderly Heir will be next, We will make our pleas to the Court and Judges to Please Close this Probate.

(5) Enclosed - A copy of a letter Dennis Moore has sent to the S.C. Court of Appeals dated Sept. 3, 2019. Dennis Moore has stated lies through-out the letter ONLY to keep the Probate Opened. Again, we ask Please Close this Probate.

(6) The remaining 4 Heirs are devastated with Dennis Moore's actions AS P.R.

- (A) Dennis Moore has lied through-out the entire Probate.
- (B) Dennis Moore has retained 4 attorneys in this Probate - Attorney Loman, attorney Porter Stewart, attorney David Smith and attorney David Purant to defend his Lies and False Statements.
- (C) Dennis Moore emptied our parents safe and retrieved all the money in the safe without the other Heirs being Present.
- (D) After Dennis Moore went in our parents house by (Himself) The remaining Heirs found their mothers Jewelry Box empty with the Lock Broken.
- (E) Dennis Moore had a signature stamp made with Thomas G. Moore's signature to take money away from all of T.G. Moore's accts.
- (F) It has been proven that Dennis Moore is a Liar and a Thief when Judge Scott give Dennis Moore \$50.00 for his duty as Personal Representative

STATEMENT OF ISSUES ON APPEAL

The evidence to this issue was submitted in court to Judge Scott.

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?

The evidence to this issue was submitted in court to Judge Scott.

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?

COPY

RECEIVED COPY

JUN 18 2019

SC Court of Appeals

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.

Please, be fair to the Heirs by their Parents Wishes in their Will. Please Return this issue Back to the 5 Heirs.

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

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

Michael Dennis Moore, Appellant,

v.

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

9-24-19

Appellate Case No. 2018-001144

The remaining 4 of the 5 Heirs are angry and upset that this letter (Enclosed) was submitted through our Court system to be Legal without a Date and Most Importantly Without A SIGN SIGNATURE from one of our Parents. The Fact is if this letter is Legal, we have a right to type a letter with NO Signature and take away anyone's property or anything they own. Being a rightly Elected Official to give Justice in our Courts, 4 of the 5 Heirs are totally devastated that Judge Scott or any other Judge would accept this letter or any other document without a Signature to be Legal. Pierce Campbell submitted the letter to Judge Scott the day of the Hearing Dec. 22, 2015 for his client Thomas P. Moore to claim the \$350,000.00 interest our Parents had in the Richland County Property. Judge Scott came from the same Law Firm as Pierce Campbell before he became a Judge. There has been rumors that the Close Relationships had an affect with Judge Scott's decision with the Illegal, undated, unsigned letter. Our Parents Probate case is entering into the 6<sup>th</sup> year. Our main concern is to Close The Probate and not deal with another issue to defend concerning Judge Scott and Pierce Campbell. The facts and evidence concerning this Illegal, undated, unsigned letter is stated in the Transcript from the Dec. 22, 2015 Hearing. We would make our pleas to the S.C. Court of Appeals Judges to look at this Illegal, undated, unsigned letter and read the Lies and Speculations from Pierce Campbell and Thomas P. Moore to Judge Scott in the Dec. 22, 2015 Hearing about this letter concerning the Richland County Property. We will ask the S.C. Court of Appeals Judges to read our parents Will and Please be fair to the Heirs of our Parents Wives and Return the Richland County Property Issue Back to ALL the Heirs.

Sincerely,  
Heirs of Thomas G. Moore  
and Earline B. Moore

COPY

Thomas G. Moore and Lester P. Moore purchased five acres of land in Horrell Hill, SC out from Columbia, SC off of Highway 76. The land was deeded in Thomas G. Moore and Lester P. Moore's name at the Columbia Court House. It was purchased for the purpose of building a new church on it.

Thomas G. Moore has three plaques that were awarded to him from Horrell Hill Baptist Church for his support and donations and tithing in building of the church, plus his twenty-five years of attending and supporting the church. He has continued paying his tithes up to the writing of his LAST WILL AND TESTATMNT ON FEBRUARY 6, 1998.

If this church in Horrell Hill, SC is ever RENTED OR SOLD, Thomas G. Moore bequeaths his half INTEREST OR OWNERSHIP to go to Thomas P. Moore. I have paid one half of the land and church building on this land.

My oldest son, Thomas Paul Moore, is a licensed minister ad if he decided to or was asked to run or help pastor the church, AFTER Lester P. Moore has DECEASED, I (Thomas G. Moore) would bequeath my one-half interest to go to Thomas P. Moore (My oldest son). If he does not want to pastor at the church, I would bequeath my one-half interest or ownership in the church and land to my son Thomas P. Moore, if the church is ever rented of sold.

COPY

# 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

---

## ORDER

---

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.

FOR THE COURT

BY V. Claire Allen, Deputy  
CLERK

**FILED**

July 9, 2019 S.S.

9-24-19

# 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

- ① Enclosed are 3 copies from Judge Scott's Order filed Nov. 29, 2016 after the Hearings.
- ② Enclosed, please read Page 19 from Judge Scott's Order.
- ③ On Page 19 Enclosed - Judge Scott mentioned T.G. Moore's Last Bank Account he opened 4-5-2013 at First Bank when T.G. Moore passed away 12-20-2013.
- ④ Judge Scott states on Page 19 Enclosed in his Order - It is Undisputed that the First Bank account was Solely Owned by Pecedent with NO OTHER PERSONS.
- ⑤ Judge Scott has stated on Page 19 Enclosed - From April 5, 2013 until the date of Pecedent's death on Dec. 20, 2013 the Pecedent deposited \$217,875.00 into this account.
- ⑥ Enclosed is a copy of the Bank Acct. #851000527 at First Bank Solely Owned by T.G. Moore.
- ⑦ Time ran out in Court and this Bank Acct. Issue was not settled.
- ⑧ If we could have finished this Issue - Phillip F. Moore indeed had ALL the Proof and Evidence that Dennis Moore stole ALL T.G. Moore's Inventory he purchased through this account and the \$217,875.00 in this account.
- ⑨ All the evidence and Proof that Phillip F. Moore presented in Court against Dennis Moore was submitted by way of documents by T.G. Moore and Cancel Checks from T.G. Moore's Bank Accounts over Solely by T.G. Moore.
- ⑩ The next Page will Prove Dennis Moore had a signature stamp made in his possession with T.G. Moore's signature on the stamp to take away money from the account when T.G. Moore was in a coma and passed away Dec. 20, 2013.

MOORE'S CARS LLC  
SINCE 1943  
1827 TRADE ST.  
FLORENCE, SC 29501

MANHEIM PALM BEACH

DATE 5-29-13

1 \$ 83,815.00

DOLLARS

FOR Mrs. White (\$550)

2013

Date 06-05-2013 amount 83815.00 Serial 1021  
Sequence 321790 DbCr D TR 53104568 Trancode 17 InstitutionID

T.G. Moore, opened acct. # 0527 at First Bank 4-5-13. This is a copy of a check wrote by T.G. Moore (Himself) 5-29-13 from this acct. before he Passed Away 12-20-13

Every check T.G. Moore wrote Himself from ALL his accts. He would always write check wrote by T.G.M. below his signature.

- ① T.G. Moore was admitted in the Hospital 12-12-13.
- ② T.G. Moore went into a Coma 12-13-13.
- ③ T.G. Moore never came out of the Coma and passed away 12-20-13

These 2 checks are filled out with Dennis Moore's Handwriting. Dennis made a signature stamp made with T.G. Moore's signature. These 2 checks below were written and stamped when T.G. Moore was in a Coma and 1 day before T.G. Moore passed away.

MOORE'S CARS LLC  
SINCE 1943  
1827 TRADE ST.  
FLORENCE, SC 29501

DATE 12-19-13

1254

66-456-531

PAY TO THE ORDER OF County Treasurer

Four Hundred & Fifty three Dollars 55 cents

\$ 453.55

DOLLARS

FOR Notice No. 13-049586

FIRST BANK

12/26/2013 1254 \$453.55  
5250000385133 We believe Dennis Moore used the signature stamp on ALL of T.G. Moore's Accounts

MOORE'S CARS LLC  
SINCE 1943  
1827 TRADE ST.  
FLORENCE, SC 29501

DATE 12-19-13

1255

66-456-531

PAY TO THE ORDER OF County Treasurer

One Hundred & Sixty Six Dollars 46 cents

\$ 166.46

DOLLARS

FOR Notice No. 13-049587

FIRST BANK

12/26/2013 1255 \$166.46

19  
8/14

Moore argues that most of these checks are merely the Decedent moving money from one of his bank accounts to another of his bank accounts. The problem with this argument is that the only bank account in the Decedent's name listed on the Estate inventory is a First Citizens checking account containing \$37,052.25. Although no cash is listed on the inventory filed by the Personal Representative testimony revealed that there was \$14,000 of cash in the Decedent's safe at his death. These two assets fall far short of the total of the amount of checks written by the Decedent and do not support Dennis Moore's theory. No evidence has been presented to demonstrate that any of these funds have been repaid to the Decedent or to his Estate. Based on the evidence presented, the Court holds that for the period of May 10, 2011, through June 11, 2013, Dennis Moore, as the owner of Moore's Cars, LLC, received funds totaling \$454,640.00 from the Decedent.

Finally, on April 5, 2013, the Decedent opened an account at First Bank. It is undisputed that the First Bank account was solely owned by Decedent with no other person or persons depositing any funds into the account. From April 5, 2013, until the date of Decedent's death on December 20, 2013, the Decedent deposited \$217,875.00 into this account. Each deposit represented proceeds from the sale of a car. However, there is no accounting for these funds and Philip Moore contends these funds should be included in the assets of the account. Philip Moore also offered an exhibit he prepared that offered scenarios of possible explanations as to where the money was spent. However, there is insufficient evidence for the Court to determine with certainty whether the Personal Representative has failed to properly account for the funds deposited into the First Bank account.

Based upon the foregoing, the Court finds that Personal Representative has failed to report and account for a substantial sum of money in the following instances: (1) failure to

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

IN THE MATTER OF THE ESTATE  
OF: THOMAS G. MOORE

IN THE PROBATE COURT  
CASE NO. 2014-ES-21-0013

ORDER

2016 NOV 29 PM 2:17  
J. MURPHY SECRETARY, JR.  
JUDGE PROBATE CT.  
FLORENCE COUNTY, S.C.

FILED

The Decedent in this matter Thomas G. Moore died on December 20, 2013. He left a

will dated September 27, 1999 in which he named his son Michael Dennis Moore as Personal Representative. This will was admitted to probate in the Florence County Probate Court on February 20, 2014 and Michael D. Moore was appointed Personal Representative on that date.

The Decedent was survived by three sons, Thomas Paul Moore, Phillip Fredrick Moore and Michael Dennis Moore and two daughters Francine Laura Lawhon and Linda Kaye Moore. The Original Inventory and Appraisement for this Estate was filed on April 24, 2014. On April 8,

2015 the Personal Representative was informed by this Court that nine months has elapsed since his appointment and that it was necessary for him to file an accounting with this Court. A date of April 20, 2015 was set for the Personal Representative to come in with his accounting. The Personal Representative did not respond in any way to the Court.

This matter came before the Court with the consent of all interested parties for a hearing to approve Estate closing documents on December 22, 2015, and subsequently on July 27, 2016.

Extensive testimony and documentary evidence was received. A number of matters were raised in these hearings including determining: (1) whether a separate writing found with the Decedent's Last Will and Testament should be integrated into the Will to address issues related to certain real property located in Richland County ( here in after the "Church Property"); (2) whether any of the heirs are entitled to an additional one-sixth share of the Estate pursuant to the caretaking clause in the Last Will and Testament of the Decedent; (3) whether the proceeds from

①  
JMS

payment for loans made by Decedent to Tammy Jackson; (2) failure to account for funds received for the repossession and sale of the 2004 Jaguar; and (3) failure to account for loans to Moore's Cars LLC. Accordingly, the Court finds that Dennis Moore is indebted to the estate in the amount of \$473,838.00.

### CONCLUSION

90  
DMS  
It appears that the amounts ordered for Dennis Moore to repay the Estate exceed the one-fifth share which Dennis Moore would otherwise be entitled to receive. As such, the 1/5 share of the estate that would otherwise be payable to Dennis Moore shall be subtracted from the amount he is obligated to repay and he shall pay the difference. The other four beneficiaries would then split the Estate four ways. The Personal Representative is ordered to present new estate closing documents that comply with this order within thirty days of the date of this order. The only other appropriate estate attorneys' fees are those to be paid to S. Porter Stewart's as attorney for the estate. Any fees due to David M. Smith, Esq. shall be paid by Dennis Moore and not by Estate funds.

**First Bank**  
**Florence Second Loop Branch**  
**452 2nd Loop Road**  
**Florence, SC 29505**

**OWNERSHIP OF ACCOUNT - CONSUMER PURPOSE**

INDIVIDUAL  \_\_\_\_\_

JOINT - WITH SURVIVORSHIP (and not as tenants in common)

JOINT - NO SURVIVORSHIP (as tenants in common)

TRUST - SEPARATE AGREEMENT:

REVOCABLE TRUST OR  PAY-ON-DEATH  
 DESIGNATION AS DEFINED IN THIS AGREEMENT  
 Name and Address of Beneficiaries:

**OWNERSHIP OF ACCOUNT - BUSINESS PURPOSE**

SOLE PROPRIETORSHIP

CORPORATION:  FOR PROFIT  NOT FOR PROFIT

PARTNERSHIP  LIMITED LIABILITY

BUSINESS: **NEW & USED CARS**

COUNTY & STATE OF ORGANIZATION: **FLORENCE/SC**

AUTHORIZATION DATED: **5/05/2003**

DATE OPENED **04/05/2013** BY **SCOTT F**

INITIAL DEPOSIT **458.00**

CASH  CHECK  On us/Transfer

HOME TELEPHONE # **843- 6622834**

BUSINESS PHONE # \_\_\_\_\_

DRIVER'S LICENSE # \_\_\_\_\_

E-MAIL \_\_\_\_\_

EMPLOYER \_\_\_\_\_

MOTHER'S MAIDEN NAME \_\_\_\_\_

Name and address of someone who will always know your location: \_\_\_\_\_

**BACKUP WITHHOLDING CERTIFICATIONS**

TIN: **582676977**

TAXPAYER I.D. NUMBER - The Taxpayer Identification Number shown above (TIN) is my correct taxpayer identification number.

BACKUP WITHHOLDING - I am not subject to backup withholding either because I have not been notified that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the Internal Revenue Service has notified me that I am no longer subject to backup withholding.

EXEMPT RECIPIENTS - I am an exempt recipient under the Internal Revenue Service Regulations.

SIGNATURE: I certify under penalties of perjury the statements checked in this section and that I am a U.S. citizen or other U.S. person (as defined in the instructions).

**Thomas G. Moore** 04-09-13  
 (Date)

**ACCOUNT NUMBER** \_\_\_\_\_

**ACCOUNT OWNER(S) NAME & ADDRESS**  
**MOORE'S CARS LLC**  
**1827 TRADE ST**  
**FLORENCE, SC 29501-6961**

NEW  EXISTING

TYPE OF ACCOUNT  CHECKING  SAVINGS

MONEY MARKET  CERTIFICATE OF DEPOSIT

NOW  \_\_\_\_\_

This is your (check one): **BUSINESS FIRST**

Permanent  Temporary account agreement.

Number of signatures required for withdrawal **001**

FACSIMILE SIGNATURE(S) ALLOWED?  YES  NO

[ X ]

**SIGNATURE(S)** - The undersigned certifies the accuracy of the information herein has provided and acknowledges receipt of a completed copy of this form. The undersigned authorizes the financial institution to verify credit and employment history and/or have a credit reporting agency prepare a credit report on the undersigned, as individuals. The undersigned also acknowledge the receipt of a copy and agree to the terms of the following agreement(s) and/or disclosure(s):

- Terms & Conditions
- Truth in Savings
- Funds Availability
- Electronic Fund Transfers
- Privacy
- Substitute Checks
- Common Feature

(1): [ X ] **Thomas G. Moore**  
**THOMAS G. MOORE**  
 I.D.# \_\_\_\_\_ D.O.B. \_\_\_\_\_

(2): [ X ]  
 I.D.# \_\_\_\_\_ D.O.B. \_\_\_\_\_

(3): [ X ]  
 I.D.# \_\_\_\_\_ D.O.B. \_\_\_\_\_

(4): [ X ]  
 I.D.# \_\_\_\_\_ D.O.B. \_\_\_\_\_

Authorized Signer (Individual Accounts Only)

[ X ]  
 I.D.# \_\_\_\_\_ D.O.B. \_\_\_\_\_

9-24-19

# 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

6A ♦ THURSDAY, FEBRUARY 28, 2019

## LINDA KAYE MOORE

Linda Kaye Moore, 66, of Florence, SC, passed away on Wednesday, February 27, 2019 at McLeod Hospice House surrounded by her family.

Ms. Moore was born a daughter of the late Earline Broach Moore and Thomas G. Moore.

In addition to her parents, she is preceded in death by sister, Christine Matthews.

Ms. Moore is survived by her sons, Chad Owens (Tiffany), Brad Owens, and Justin Owens (Delina); four grandchildren; one great-grandchild; brothers, Thomas Paul Moore (Barbara), Phillip Moore, and Dennis Moore (Crystal); sister, Francine Lawhon; and six nieces and six nephews who loved and cared for her.

Funeral services will be held at 2:00 PM on Friday, March 1, 2019, at the Stoudenmire-Dowling Funeral Home Chapel. Burial will follow at Mount Hope Cemetery.

Family will receive friends from 6:00 PM - 8:00 PM on Thursday at the funeral home.

Memorials may be made to McLeod Hospice, P. O. Box 100551, Florence, SC 29502 or to the Alzheimer's Association, 140 Stoneridge Drive, Ste 210, Columbia, SC 29210.

Please sign the tribute wall for the family at [www.stoudenmiredowling.com](http://www.stoudenmiredowling.com).



Before our parents Probate is Closed, will another Heir - Pass AWAY without receiving a penny from our Parents Estate. The Question we would like to ask is - Why waste your time and money to make a Will? Linda Kaye Moore's Health was deteriorating each day, every month, every year needing medicine and Doctors Care. Linda was a single elderly lady when her father, Thomas G. Moore passed away. It was T. G. Moore taking care of his daughter, Linda, Kaye Moore buying her medicine she needed and paying ALL her medical and Doctor bills. As any Elderly would know, they do not receive enough funds from Medicare and Medicaid to fully help them with their needed expenses. Linda Moore desperately needed her parents Probate Estate to close to receive her part of the 2 million dollar Estate her parents left to help her the rest of her life. All I would like to ask everyone, how would you feel if you were in Linda's shoes?

The names listed below did not cause Linda to Pass Away but, the fact is keeping her parents Probate Open, played a big part in her death so SOON denying her help she needed. Thanks to: Porter Stewart, David Smith, David Parent, Pierce Campbell, Judge Scott.

The Main persons that kept the Probate open were Linda Moore's Blood Brothers - Dennis Moore and Thomas Moore. Both of them have lied and become thieves.

# The South Carolina Court of Appeals

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

9-24-19

Michael Dennis Moore, Appellant,

v.

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

Appellate Case No. 2018-001144

Mr. Phillip F. Moore Jr. received a copy of letters in the mail 9-5-19 in a package from our Personal Representative Michael Dennis Moore. These letters were addressed to the South Carolina Court of Appeals. The remaining 4 Heirs of Thomas G. Moore are well educated with High School Diplomas. We are very embarrassed the way this letter was written and sent to the S.C. Court of Appeals Judges. As you can see with this letter Dennis Moore with only a 1<sup>st</sup> grade education was NOT educated to carry out the duty of a Personal Representative. The remaining 4 Heirs knew this but Judge Scott knew nothing about Dennis Moore. In the Probate File you will find several letters to Judge Scott from the other 4 Heirs before the Probate opened to appoint the Alternate - Phillip F. Moore Jr. as Personal Representative. Judge Scott denied the request of the remaining Heirs. We believe Judge Scott's opinion has changed now about Dennis Moore in his Order giving Dennis Moore a total of \$50,000 for his duty as Personal Representative in a 2 million Dollar Estate. We have read the copies of these letters sent to us by Dennis Moore. Seeing all the misspell words and reading the false statements in these letters, we cannot understand what Dennis Moore is trying to prove. Through-out this Probate Dennis Moore has retained 4 attorneys - attorney Loman, Porter Stewart, David Smith and David Durant to help him take away our parents Estate from the other 4 Heirs. Dennis Moore should have ask one of these attorneys to write these letters and NOT showing his ignorance.

The remaining 4 Heirs of Thomas G. Moore and Earline B. Moore would like to apologize to the S.C. Court Judges receiving these ridiculous letters that were sent by a un-educated person.

P.S. - Dennis Moore is doing everything  
he can do to KEEP THIS PROBATE OPEN.  
Keeping our Parents Estate from the  
Remaining 4 Heirs.

Sincerely,  
The remaining Heirs  
of Thomas G. Moore

The South Carolina Court of Appeals

In the matter of the Estate of Thomas Gaddy Moore

COPY

Case No. 2018-001144

Page ①

This will be the final letter that I Dennis Moore will be sending you. IF all of this what I am writing down below are legal and there where NO South Carolina law's or Rules Broken and they had the right to do what all they have done from 2014 to 2016 I Dennis Moore will respect your ruling. All I'm asking is please look at EVERYTHING that took place. (IS it Legal) I'm NO Attorney.

① Now we know for a fact and I Dennis Moore have all ready establish there where a (Conflict of Interest) because the Judge J. Munford Scott JR and the oppose attorney both are from the same law firm not to mention they both also where shareholders at one time in the same law firm at Turner/Padget and why Mr. Cal Pieree Campbell did not step down I can't not understand. Because there where a personal connection.

② We also know that this probate Judge was (Bias) why would this Judge aloud one Brother Phillip Moore bring in new evidence on the final day of the ruling but then he would not aloud Dennis Moore to bring in his evidence to prove his innocent. He wrote in his ruling in 2016 no new evidence made not be permitted. He did not want NO Body to see what really took place in court.

- (3) I would like to know from someone is this also legal where Phillip Moore SR went into the Judge Chamber and discuss this case with him in private and there where no attorney's present and Phillip Moore SR said himself in the letter that he wrote Dennis Moore that Judge Scott Agreed with him is that legal for someone to do that.
- (4) Now we also know that there was a (Bribe) in this case also because the oppose attorney Mr. Campbell called my attorney David Smith and told him to tell Dennis Moore I will drop all the charging againsts him IF I Dennis Moore would be willing to give my client Thomas Paul Moore his part of the estate. That telled me Right there that Mr. Campbell dont even beleave what the Judge put in his ruling. And IF my attorney David Smith try to deny it and said Mr. Campbell did not said it. Well then I want you to please listen to my wife phone. When I was talking to David Smith Secretary on my phone. Because my wife and I could not beleave what we herd on that phone. When they where making Dennis Moore this offer.

⑤ How can you Filed documents and letter's throw the Courts System and they where Filed and the one on the other side Never received them all OF the letter's that Was Filed Buy Phillip moore SR to Judge Scott Was never sent to Dennis moore. And the evidence that Phillip moore send to Judge Scott the Judge never send me a copy. IS that Legal For someone to Filed documents and LETTERS throw the Court and you dont get a copy.

Dennis moore never wrote a letter to the Judge asking him For his advice as our Probate Judge.

Dennis moore never got a chance to go in the Judge Chamber and telled him my side OF the story and the Judge agreed With me.

⑥ What I dont understand about this Case all OF the Attorney's that Was involved in my Father estate they where From Florence South Carolina they all had to know that Mr. Campbell and the Probate Judge J. Munford Scott JR. Where From Turner/padget before he became a Judge. Because they all where attorneys, Why none OF them did not mention one word about this I dont understand all they would have said this is a (CONFLICT OF INTEREST). And I Dont want no part OF it But yet they all took our money.

I Would like For The South Carolina Court OF Appeals Please read Some OF the letter's that my Brother Phillip moore SR, had wrote to the Probate Judge J. Munford Scott JR, He had wrote tons OF letters asking Judge Scott For his advice that's on page (1) Then he wrote another letter telling Judge Scott to reveiw this evidence that I am sending you before your ruling on the Probate that's on page (2). Now Phillip moore SR is telling the Judge We have Witnessed our youngest brother (Dennis moore) Fail us in his responsibilities as (P.R.) not being ForthComing and trust worthy With our Father's estate. Our hope is that the Court Will see all the evidence and make it Right in the Closing OF our Case on page (3) You would think Phillip moore and Judge Scott Was partner. Why Would Phillip moore SR, or Francine moore Lawhon or Thomas Paul moore Say these Bad things about I Dennis moore. They dont even know me or our Father they have not been around Dennis moore or Thomas Gaddy moore our Father in years. And them all OF a Suddenly they all Show up. Phillip moore SR had not spoken to our Father in TWO years prior OF him passing away and Francine moore Lawhon She has not spoken to our Father in 3 or 4 years and Thomas Paul moore he did come 2 or 3 times but Went he came he left With a Pocket Full OF money. My Father had bought a New Home and Phillip moore SR or Francine moore Lawhon has never been inside OF his New Home until he passed Away. Phillip moore SR and Francine moore Lawhon they Both thought they Where not in the Will.

Look here these Guys have all ready try this one time before Thomas Paul moore and Francine moore Lawhon they Both had all ready Filed lawsuits againts our Father and mother years Ago. And if you dont beleave Dennis moore Well look at the Court Records, Are you Could Called their attorney Malby McEachin because Both OF them use the Same attorney to Filed lawsuit againts our Father.

Now my sister Linda Kay moore has passed Away in Feb 2019 Now Both OF my brothers Thomas Paul moore this is Mr. Campbell Client, and also Phillip moore SR. Both has Filed Creditor's Claim againts my sister Linda Kay moore estate. They Both are trying to Collect attorney's Fees that they Spent in my Fathers estate.

Shame on Yall Let the dead rest in Peace.

Sigh

Dennis moore

To All the Attorney's and my Brothers and  
sister. I am sending you copy's of What Dennis Moore  
is Filing on 9-3-19. I am Sending The South  
Carolina Court of Appeals a letter trying to  
EXplain What really happen during 2014-2016.

C.C. Norwood David Durant, JR Esquire

C. Pierce Campbell, Esquire

James Ross Snell JR. Esquire

Vicki D. Houtsogiannis Esquire

Francine Laura Lawhon

Phillip Frederiek Moore

Thomas Paul Moore

**RECEIVED**

SEP 26 2019

SC Court of Appeals

PRO-SE Hens  
Philip F. Moore  
1504 PAMON DRIVE  
FLORENCE, S.C. 29505

RECEIVED  
SEP 26 2019  
SC Court of Appeals

HONORABLE JENNY ABBOTT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET  
COLUMBIA, S.C. 29201