

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

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SEP 26 2019

SC Court of Appeals

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

Dear Ms. Kitchings,

Without attorneys Pro-SE Heirs mailed a package of documents Priority mail 7-18-19 to be submitted on the docket for the Judges to Review when making their decision on the Appeal. With the documents the Pro-SE Heirs asked for a response if these documents were going to be Reviewed by the Judges, We Received NO response. It has been unfair and devastating defending our Parents Estate by their Will for 5 years in Florence, S.C. against the other 2 Heirs - Dennis Moore, Thomas P. Moore and their attorneys. The Pro-SE Heirs Phillip F. Moore, Francine L. Lawhon and Linda K. Moore (deceased) cannot be involved in their Parents Probate, as they would like 150 miles in Columbia, S.C. as they did in Florence, S.C. The ONLY option we have is by mail. It is NOT ONLY the hurt, pain and suffering with the Probate, what has Hurt us the most is the passing away of our sister Pro-SE Linda Hoge Moore. Linda has suffered 5 years in this Probate before passing away to receive her part of the 2 million dollar Estate left by her parents 5 years ago to be divided equally by the Will. Lastly, what if were your sister? The Pro-SE Heirs will ask again that the documents Priority mailed 7-18-19 and the document Enclosed to please be reviewed on the docket by the Judges. We were told that ONLY attorney could go on the computer to read everything concerning the Probate. Would it be to much to ask, to reply by letter to the Pro-SE Heirs the steps to take on the computer? Please respond!

P.S. - We ask everyone in Columbia, S.C. to be Fair, Honest and Help us, Please Close this Probate.

Thank you for your time
Pro-SE Heirs of Thomas G. Moore

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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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 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.

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