



The South Carolina Court of Appeals

9-3-19

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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Jenny Abbott Kitchings

Attn: Ms. Kitchings

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

RECEIVED

SEP 05 2019

SC Court of Appeals

Page ①

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. Koutsogiannis Esquire

Francine Laura Lawhon

Phillip Frederiek Moore

Thomas Paul Moore

RECEIVED

SEP 05 2019

SC Court of Appeals

9-3-19

The South Carolina Court of Appeals
IN the matter of the Estate of Thomas Gaddy Moore
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
am writing down below are legal and there
where NO South Carolina laws or Rules Broken
and they had the right to do what all they
done from 2014 to 2016 I Dennis Moore will respect
your ruling. All I'm asking is please look at every thing
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 Pierce 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 them 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 change 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 any 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 ton's OF letters
asking Judge Scott For his advice that's on page (1)
Them 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 Clasing 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 Baddy 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 lawsuit's 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 Malloy 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 againt's 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

MOORE

3401 Cresty Court

Florence, SC 29501

COLUMBIA SC 290

24 JUL 2017 PM 1 L

D. Moore
2129 Kristen Channel
Florence, S.C. 29501

29501-834629

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. Without a attorney
present.

this help. 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 wanted~~
 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 Moore's Car 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 I - Phillip Moore NOT you or anyone else
 with these loans and checks, Judge Scott was ordered



T.G. Moore Probate

Page 2

Judge Scott,

Please review this evidence before your ruling on the Probate. I met with Ms. Elmore on February 10, 2016 and she stated that I would have to appeal after your ruling. I do not wish to make an appeal. My plea is to bring this evidence to your attention because it contains essential information about particular issues in this case. Thank you in advance for your time and consideration.

Sincerely,

Phillip F. Moore Sr.
Phillip F. Moore Sr.

FILED
2016 MAR -9 AM 11:48
JUDGE SCOTT
FLORENCE COUNTY, SC

Judge Scott:

As I stated before, Mr. David Smith has neglected to completely obtain the knowledge of this Probate in its entirety. In his letter to you (February 5, 2016), Mr. Smith builds false accusations about me. Mr. Smith writes in his last paragraph that Phillip Moore is the one delaying the closing of this Probate. I have forwarded 3 copies to you that indicate the parties responsible for the closing delays of this Probate. Mr. Dennis Moore and Mr. Porter Stewart waited until December 1, 2015 to settle the first issue in the Probate (Tammy Jackson issue).

 **SMITH AMMONS, LLC**
Attorneys at Law

DAVID M. SMITH
GREGORY D. AMMONS
KYLE M. HOBBS (OF COUNSEL)

Issues Presented in Phillip F. Moore's Letter to the Court Filed December 30, 2015

Phillip F. Moore states that it is the responsibility of my client, the Personal Representative of the estate to ensure the closing of the estate is not delayed. However, he then asks the Court to not close the estate until another hearing is scheduled to address other alleged issues that he has failed to present over the past two (2) years. It is preposterous of Phillip F. Moore to even attempt to place the blame of this lengthy process on my client when, after 2 years, Phillip F. Moore is attempting to schedule additional hearings and bring new issues before the Court. Therefore, it is my client's position that it is appropriate to allow the Court to rule on any and all issues presented, and there is no need for an additional hearing to prolong the closing of this estate.

2

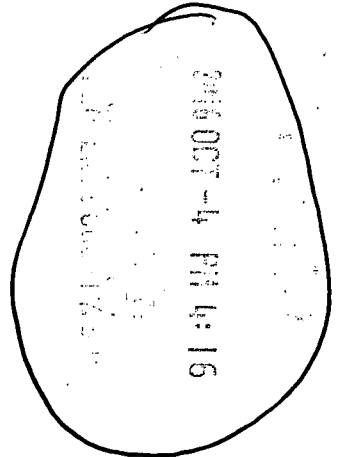
September 30, 2016

Judge Scott,

I have enclosed a copy of a letter from June 29, 2016 that I received from Ms. Elmore. The fact that we were near the closing of this Probate, I was surprised and very disappointed to receive the letter. I believe it all stems from the time I asked Ms. Elmore to respond to the issues Mr. Smith sent to you. I had waited several days and Ms. Elmore did not reply. It was then that I took it upon myself to send you the files. Without reason, Ms. Elmore placed me in a position to finish this Probate as Pro-SE. As her client, I have paid Ms. Elmore to bring forth the truth and not turn her back on me at this point. Ms. Elmore demanded to be released, so I signed the consent form.

Phillip F. Moore Sr.

Phillip F Moore Sr.



JAM

Judge Scott,

Ms. Elmore called me and asked if I could come in Friday, September 23, 2016 to discuss issues concerning drafting a summary or proposed order to send to you. My sister, Francine Lawhon, went with me so she could hear what Ms. Elmore wanted and she could check with me to make sure it was all together. Ms. Elmore asked me to give her all of the information as soon as possible so she could organize it and submit it to you. That Friday and Saturday, I searched through my files and collected everything that Ms. Elmore requested, even the last issues of T.G. Moore's last bank account. Everything was in order for Ms. Elmore to understand. I had to go out of town the following Monday, September 26, 2016. My sister, Francine Lawhon, understood everything I had for Ms. Elmore and I asked her to take it all on that Monday (9/26/16). If Ms. Elmore had any questions, my sister could answer them all right then and there. My sister called Ms. Elmore's office several times to speak with Ms. Elmore and she never responded to my sister's calls. The receptionist was told to ask Ms. Elmore to return the call because it was about the information she wanted from Phillip Moore.

As I write this letter to you, today is September 30, 2016. Ms. Elmore has not called or contacted me since we met on September 26, 2016. I am led to believe the reason Ms. Elmore will not contact me or send this information to you to close this Probate is because I would not sign the letter she had made on her own. Ms. Elmore had the letter written to look as though it was from Phillip Moore to Judge Scott. I did not say anything that Ms. Elmore stated in the letter. Contrary to what Ms. Elmore may believe, I do not need her to write a letter for me.

I would like for you, Judge Scott, to know that I have everything organized for Ms. Elmore in the order that you asked her to submit it to you. My concern is whether you will ever receive all the facts to close our case. I, as well as my brother Thomas and my sisters Francine and Linda, have experienced pain and suffering throughout the course of this Probate case. ~~We have witnessed our youngest brother fail us in his responsibilities as P.R. by not being forthcoming and trustworthy 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.~~

Phillip F. Moore Sr.
Phillip F. Moore Sr.

RECEIVED
2016 OCT -4 PM 4:15

FILED

June 15, 2018

Pear Judge Scott

2018 JUN 18 AM 11:44

Porter Stewart has kept the proceeds from our parents Estate in his personal firms trust account since Jan. 1, 2014. Today is June 15, 2018. These proceeds left by our parents belongs (ONLY) to the heirs and no one else. Since day one we do not know what has been deposited or taken away from his trust account.

- (1) On May 7, 2018 and May 9, 2018 the heirs called Mr. Stewart ONLY to give us a copy of our parents Estate Accounting, we received NO Response.
- (2) On May 11, 2018 the heirs went to Porter Stewart's office, his secretary informed us he wasn't in his office. We left a message with his secretary to please have Porter Stewart call us, all we are asking for is a copy of the Estate Accounting of our parents that he has kept in his trust account for 4½ years. Porter Stewart did not respond.
- (3) We made 2 more attempts by phone May 14, 2018 and May 15, 2018. Again NO Response.

Judge Scott, we believe we are entitled to know about the accounting held in his trust account belonging to the heirs of our parents. We have made several attempts to solve this issue before writing this letter. NO Response. All Porter Stewart has to do is tell his secretary to make copies and we will be glad to pick the copies up at his office.

Judge Scott, we have no other choice than to ask you to please ORDER Porter Stewart to give us a copy of the accounting in his trust account from 1-1-2014 to 6-15-2018.

Phone # 843-601-3347

Thank you,
Philip F Moore Jr.
3401 Crantz Court
Florence, S.C. 29501

Dear Judge Scott,

During the December 22, 2015 hearing Dennis was not truthful about the \$92,500 balance owed on the houses he purchased from T.G. Moore. I would like for Dennis to produce two cancelled checks from his bank showing his name at the top, signature at the bottom, and payable to T.G. Moore.

Please consider this matter before you render your decision to close this probate.

Sincerely,
Phillip Moore
Phillip Moore

Phillip F. Moore Jr.
3401 Chanty Court
Florence, S.C. 29501

COLUMBIA SC 29903

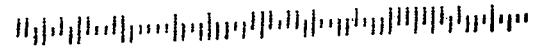
25 JUL 2008 PM 4:1



Bill

Honorable Judge Scott
Judicial Center
181 N. Liberty Street
Florence, S.C. 29501

29501-343381



Thomas P. Moore
226 White Palm Court
Florence, S.C. 29506

COLUMBIA SC 292

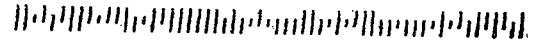
10 MAR 2016 PM 4 L



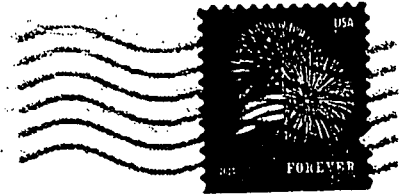
John

Honorable J. Munford Scott, Jr.
Florence County Probate Judge
180 W. Irby St., MSC-1
Florence S.C. 29501

29501\$3456 0004



Linda Moore
1454 Galy Terrace Blvd. COLUMBIA SC 290
Florence S.C. 29501 23 MAY 2016 PM 2 L



Honorable Judge Mumford Scott
Probate Court
190 N. Erby St.
Florence S.C. 29501

TURNER PADGET

- S. Porter Stewart, II, Esquire
October 10, 2014
Page 2

The next issue is how to deal with the church property in Richland County. I assume the estate will issue a Deed of Distribution of the decedent's interest to the five children equally. If any other plans for this property are contemplated, please let me know.

The final item of concern is your client's stated position that he will seek to obtain the additional 1/6 distribution of the estate assets. I have expressed our disagreement with this request based on the facts surrounding the care of Mr. Moore. We can certainly deal with our objections whenever a proposal for distribution is submitted; however, I wanted to note clearly now that we do object to such a plan and will request a hearing on the same if requested.

Please confirm your receipt of this letter and the steps your client is taking in this regard. I look forward to hearing from you soon.

Yours very truly,

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


C. Pierce Campbell

CPC:kte

cc: Mr. Thomas P. Moore

Now Mr. Campbell said himself that the property the church in Richland County should be divided in to the Five children equally.

STATE OF SOUTH CAROLINA

IN THE PROBATE COURT

COUNTY OF FLORENCE

STATEMENT OF CREDITOR'S CLAIM

IN THE MATTER OF:

CASE NUMBER: 2019 ES 2100294

(Decedent) LINDA KAYE MOORE

Decedent's Date of Death (if known): 2-27-19

Decedent's Last Mailing Address: 1454 GOLF TERRACE BLVD. APT: 2

Creditor:	PHILLIP F. MOORE SR.
Address:	1504 PAMON DRIVE FLORENCE, S.C. 29505
Telephone:	843-601-3347
Email:	
Original Creditor:	
Address (if different from above)	
Claim Amount Due:	\$ $\frac{1}{3}$ of \$23,715.00 RETAINING ATTORNEYS IN FATHERS PROBATE
Account Number:	PLUS 4% interest for 5 years
Other Reference Number:	
Basis of claim (Ex: Contract, Services Rendered for decedent, etc):	ATTORNEY FEES PAID (PERSONALLY) BY PHILLIP F. MOORE SR. TO REPRESENT LINDA K. MOORE, FRANCINE L. LAWTON AND PHILLIP F. MOORE SR. IN THE ESTATE OF THOMAS G. MOORE. A VERBAL AGREEMENT BETWEEN LINDA K. MOORE, FRANCINE L. LAWTON AND PHILLIP F. MOORE SR.
Date claim will become due (if not already due)	THE ATTORNEY FEES WILL BE DIVIDED (EQUAL) BETWEEN THE 3. THE CLAIM IS ALREADY DUE PLUS 4% interest for 5 years.
Nature of uncertainty as to the claim, if any (i.e. contingent claim, amount of claim, due date):	
Description of security as to the claim, if any (Ex: Collateral for the debt)	

FILED
 JUL 3 11 00 AM '19
 PROBATE COURT
 FLORENCE COUNTY
 SOUTH CAROLINA

Signature: Phillip F. Moore Sr.
 Printed Name: PHILLIP F. MOORE SR.
 Title: _____
 Date: 7-31-19

INSTRUCTIONS: Claims **MUST** be filed with the Probate Court of the county in which the Decedent's Estate is under administration and may be delivered or mailed to the fiduciary appointed to administer the Estate (see SCPC 62-3-803, 62-3-804, and 62-3-806).

No claim against a Decedent's estate may be presented or legal action commenced against a Decedent's Estate prior to the appointment of a Personal Representative to administer the Decedent's Estate (except see SCPC 62-3-804(1)(b)).

Satisfaction or withdrawal of claim (FORM 325) **MUST** be filed once claim is resolved.

STATE OF SOUTH CAROLINA
 COUNTY OF FLORENCE

IN THE MATTER OF:

(Decedent) LINDA KAYE MOORE

IN THE PROBATE COURT

STATEMENT OF CREDITOR'S CLAIM

CASE NUMBER: 219 ES 2100 294

Decedent's Date of Death (if known): 2-27-19.
 Decedent's Last Mailing Address: 1454 GOLF TERRACE BLVD. APT. 1

Creditor:	THOMAS P. MOORE
Address:	2216 WHITE PALM CT. FLORENCE SC 29506
Telephone:	843-661-1548
Email:	
Original Creditor:	
Address (if different from above)	
Claim Amount Due:	\$ 1/4 OF ATTORNEY FEES FOR REPRESENTATION OF PARENT ESTATE
Account Number:	
Other Reference Number:	
Basis of claim (Ex: Contract, Services Rendered for decedent, etc):	SERVICES RENDERED: ATTORNEY HIRED TO ARGUE CLAIM AGAINST OUR PARENTS ESTATE IN PROBATE AND APPEALS PROCESSES, EACH OF 4 HEIRS WILL RECIEVE EQUAL SHARES WHEN APPEALS ARE OVER EACH OF THE FOUR HEIRS SHOULD PAY EQUAL PARTS OF ATTORNEY FEES.
Date claim will become due (if not already due)	UNKNOWN UNTIL APPEALS PROCESSES ARE FINISHED. ATTORNEY: PIERCE CAMPBELL
Nature of uncertainty as to the claim, if any (i.e. contingent claim, amount of claim, due date):	
Description of security as to the claim, if any (Ex: Collateral for the debt)	

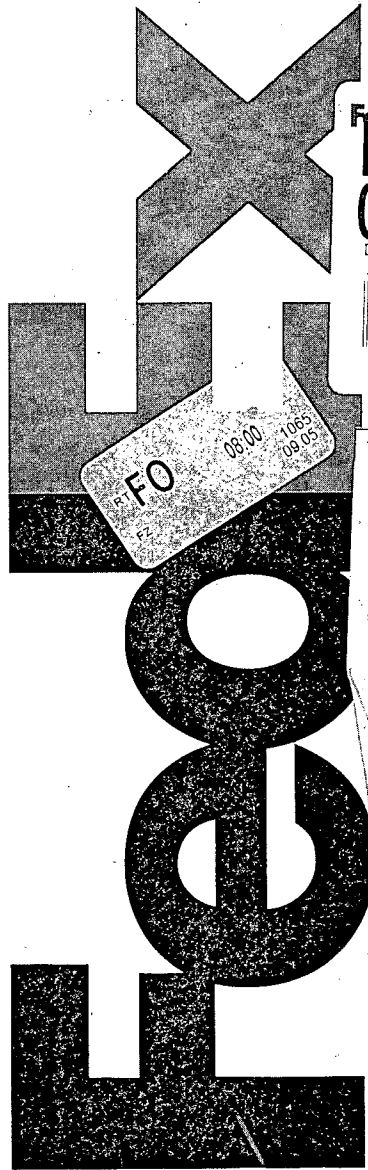
FILED
 7119 APR - 4 PM '19
 PROBATE COURT
 FLORENCE SC

Signature: Thomas P. Moore
 Printed Name: THOMAS P. MOORE
 Title: Attorney
 Date: 4-4-19

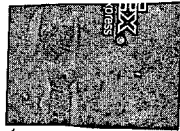
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Satisfaction or withdrawal of claim (FORM 325) **MUST** be filed once claim is resolved.



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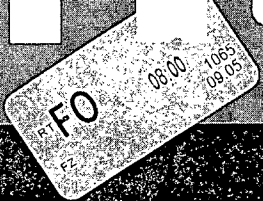


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Express US Airbill

Tracking Number 8102 7854 1065

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1 From
Date 9/4/19
Sender's Name Dennis 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 Kitchings Phone 803 734-1890

Company SC Court of Appeals - Clerk of Court
Address 1220 Senate St.
City Columbia State SC ZIP 29201

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We cannot deliver to PO boxes or PO ZIP codes.
City Columbia State SC ZIP 29201

Form No. 0215
Requirement's Copy

4 Express Package Service
 Next Business Day
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 FedEx Priority Overnight
 FedEx Standard Overnight
 2 or 3 Business Days
 FedEx 2Day AM
 FedEx 2Day
 FedEx Express Saver

5 Packaging
 FedEx Envelope*
 FedEx Pak*
 FedEx Box
 FedEx Tube
 Other

6 Special Handling and Delivery Signature Options
 Saturday Delivery
 No Signature Required
 Direct Signature
 Indirect Signature
 Signature Required

Does this shipment contain dangerous goods?
 No
 Yes
 Dry Ice
 Cargo Aircraft Only

Payment Bill to:
 Sender
 Recipient
 Third Party
 Credit Card
 Cash/Check



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SEP 05 2019 4:38
Court of Appeals

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