

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

RECEIVED

Jan. 21, 2020

JAN 22 2020

SC Court of Appeals

Dear Ms. Kitchings,

- (1) Enclosed is a letter I received January 10, 2020.
- (2) Being Pro-Se without a attorney, why am I being deprived as a Heir to be involved in my Parents Probate?
- (3) V. Claire Allen is totally confused in this letter Jan. 10, 2020.
- (4) Please look on the Computer - S.C. Courts. Org.
Event Information
6-27-2019 - Correspondence (Incoming) - Respondent Phillip F. Moore's
Letter Regarding Counsel
7-18-2019 - Correspondence (Incoming) - Please send all Correspondence
and letters to my NEW ADDRESS - Phillip Frederick Moore
1504 Pomon Drive Florence, S.C. 29505 - NOT TO ATTY.
James R. Snell.
- (5) Enclosed is a copy sent to The South Carolina Court of Appeals -
motion TO Relieve Counsel James R. Snell Jr and Vicki P. Kouloupiannis
- (6) My attorneys were relieved after the Order dated April 10, 2019 to
strike the respondents briefs of Phillip Frederick Moore
- (7) There is NO ORDER granted by the Court after April 10, 2019 to
Strike or dismiss any brief, Correspondence or Letters by Pro-SE
Phillip F. Moore submitted to the South Carolina Court of Appeals Judges.

Jan. 21, 2020

- (8) Our Rights have been taken away, being Heirs to be involved in our Parents Probate. Striking and dismissing the facts and evidence (Solely) from the Dec. 22, 2015 Hearing submitted to the S.C. Court of Appeals to be put on the docket to be reviewed by the Judges in this Appeal.
- (9) Today is Jan. 21, 2020 there is No Motion or Order made to Strike or Dismiss these documents I have Enclosed to the S.C. Court Judges to be put on the docket for review.
- (10) The Fact is the Order from the Judge dated April 10, 2019 stated to Strike and Dismiss Briefs. We do not consider the documents Enclosed as Briefs.
- (11) Enclosed are documents of proof, evidence and facts of testimony taken (Solely) from the transcript of the Dec. 22, 2015 Hearing. As Heirs of our Parents Estate we ask that these documents be put on the docket to be reviewed by the Judges.
- (12) V. Claire Allen has stated in the January 10, 2020 letter (Enclosed) I received → The respondent's prose briefs and correspondence dated September 5, 2019 are being returned to me. V. Claire Allen has me confused with Dennis Moore and his attorney David Purant. I am returning the documents dated Sept. 5, 2019 back to V. Claire Allen that was Not submitted by Phillip F. Moore.
- (13) As Heirs of our Parents we are entitled to receive a reply why these documents (Enclosed) will not be put on the docket to be reviewed by the Judges.

Heir - Phillip Fredrick Moore
1504 Damon Drive
Florence, S.C. 29505



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

↓ ↓ ↓ ↓
January 10, 2020

Phillip Frederick Moore
1504 Damon Drive
Florence SC 29505

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

Dear Mr. Moore:

We received your pro se respondent's final brief dated September 24, 2019, along with your correspondence dated September 24, 2019. Our records reflect that James Ross Snell, Jr., and Vicki D. Koutsogiannis, Esquire, are your counsel of record. No motion to relieve counsel has been made either by the attorneys or by you.

Also, by order dated April 10, 2019, the Court granted motion to strike the respondents' briefs of Phillip Frederick Moore, Linda Kaye Moore, and Francine Laura Lawhon.

The respondent's pro se brief and correspondence (dated ^{Returned} September 5, 2019) and September 24, 2019 are being returned to you.

Very truly yours,

V. Claire Allen, Deputy
CLERK

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

Office of the Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

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

motion to relieve counsel

Dear Madam or Sir:

Please include in the Record on Appeal, of the respondent Phillip Frederick Moore, motion to relieve counsel Attorney James Ross Snell, Jr., and Vicki D. Koutsogiannis,

Sincerely,

Phillip F. Moore Sr.

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 Shinda
Kaye Moore, and Phillip Frederick Moore, Respondents

Appellate Case No. 2018-001144

Jan. 21, 2020

RECEIVED

JAN 22 2020

Court of Appeals

TO: Judges in the South Carolina Court of Appeals,

Please, close this Probate. 3 of the 5 Heirs - Phillip F. Moore, Francine Lawhorn and Linda Moore, has been through 5 years of Pain and suffering, being Honest and Trustful 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 has 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) The remaining 4 Heirs are devastated with Dennis Moors acting As P.R.
 - (A) Dennis Moore has Lied through-out the entire Probate.
 - (B) Dennis Moore has retained 4 attorneys in this Probate - Attorney Lomeny, attorney Porter Stewart, Attorney David Smith and attorney David Parent 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. Moors signature to take money away from all of T.G. Moors 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.

Jan. 21, 2020

(2) 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 Lawton and Linda Moore stated the true facts about this letter from the testimony in the Dec. 22, 2015 Hearing. It was these briefs that urged Pierce Campbell to make a Motion to the S.C. Court of Appeals to have the Briefs Reinstated. 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 Harry 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.

(3) 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 else's 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.

(4) Thomas Moore and Pierce Campbell has committed Perjury in the Dec. 22, 2015 Hearing. Their testimony has greatly affected Judge Scott in his Order concerning the Richland County Property. The lies were proven through-out the Dec. 22, 2015 Hearing stating the Undated, Unsigned letter was With The Will and The Will was found inside The Safe. Please read the testimony Earlier in the transcript of the Dec. 22, 2015 Hearing on Page 65 (Enclosed) Who Found The Will and Where The Will Was Found - NOT In The Safe.

(5) 4 of the 5 Heirs Pray and make our Pleas to the South Carolina Court Judges to Return the Richland County Property Back in Probate for all five Heirs as the Will states.

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

Thomas Moore kept this undated, unsigned letter in his possession for 7 years. This letter was NEVER SEEN by the remaining 4 Heirs until Thomas Moore and his attorney Pierce Campbell submitted the letter the day of the Dec. 22, 2015 Hearings

STATEMENT OF ISSUES ON APPEAL

Jan. 21, 2020

Our Opinion

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

COPY

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.

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.

JAN-21, 2020

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

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 Relationship had an affect with Judge Scott's decision with the Illegal, undated, unsigned letter. Our Parents Probate case is entering into the 6th 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 Log 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

Jan. 21, 2020

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

Letter Thomas P. Moore submitted in Court.
NOT signed, notarized or dated to be attached
to the will.

4 of the 5 children believes they were treated
unfair by our court system & Judges By this 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

RECEIVED

JAN 22 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchens
Deputy Clerk, South Carolina Court of Appeals
1270 Senate Street
Columbia, SC 29201

I am returning these documents that
v. Claire Allen claims I submitted
Sept. 5, 2019. These documents were
submitted by Michael Dennis Moore.
Norwood David Purant, Jr., has NEVER
been Phillip F. Moore's attorney.

Phillip F. Moore Jr.



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

June 19, 2019

↓ ↓ ↓ ↓ ↓
Michael Dennis Moore
2129 Kristens Channel
Florence, SC 29501-8346

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

Dear Mr. Moore:

We received your correspondence dated March 5, 2019, March 28, 2019, April 10, 2019, May 7, 2019 and June 8, 2019. Our records reflect that Norwood David DuRant, Jr., represents you as counsel of record. Any correspondence to be filed in this appeal must be filed by counsel. No further action will be taken on these filings.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Norwood David DuRant, Jr., Esquire
C. Pierce Campbell, Esquire
James Ross Snell, Jr., Esquire
Vicki D Koutsogiannis, Esquire
Francine Laura Lawhon
Linda Kaye Moore
Phillip Frederick Moore



The South Carolina Court of Appeals 9-3-19

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

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

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 Frederick 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 Caddy 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 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 told me right there that Mr. Campbell don't even believe 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 believe what we heard 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 Not 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 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 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 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

MOORE

3401 Cranty Court

Florence, SC, 29501

COLUMBIA SC 290

24 JUL 2017 FM 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, Fred 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 Morris Cox 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 NAT 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
JAMES P. 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).



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

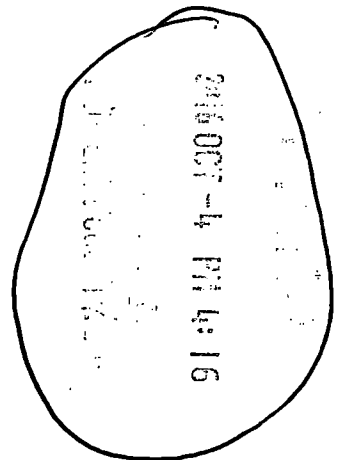
September 30, 2016

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.



JSM

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 4:16

FILED

June 15, 2018

Dear Judge Scott,

2018 JUN 18 AM 11:44

Porter Stewart has kept the proceeds from our parents Estate in his C.F. 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,
Phillip 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 Grantz Court
Florence, S.C. 29501

COLUMBIA SC 29501

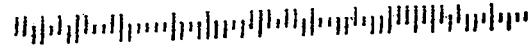
25 JUL 2008 PM 4:1



Bill

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

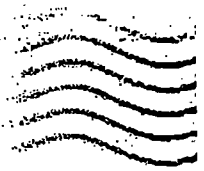
29501-343381



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

COLUMBIA SC 292

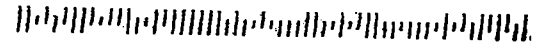
10 MAR 2016 PM 4 L



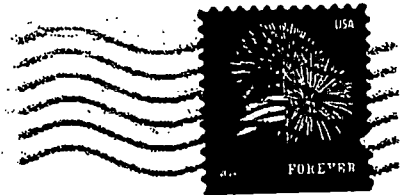
John

Honorable J. Munford Scott, Jr.
Florence County Probate Judge
180 N. 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
180 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
 COUNTY OF FLORENCE

IN THE PROBATE COURT

IN THE MATTER OF:

STATEMENT OF CREDITOR'S CLAIM

(Decedent) Linda Kaye Moore

CASE NUMBER: 2019 ES 2100294

Decedent's Date of Death (if known):
 Decedent's Last Mailing Address:

2-27-19
1454 GOLF TERRACE BLVD. APT. 2

Creditor:	PHILLIP F. MOORE SR.
Address:	1504 RAMON DRIVE FLORENCE, S.C. 29505
Telephone:	843-601-3347
Email:	
Original Creditor:	
Address (if different from above)	
Claim Amount Due:	\$ $\frac{1}{2}$ 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 PAID 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
 2019 MAR 2 AM 10:41
 PROBATE COURT
 FLORENCE COUNTY, SC

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 PROBATE COURT

STATEMENT OF CREDITOR'S CLAIM

IN THE MATTER OF:

CASE NUMBER: 219 ES 2100 294

(Decedent) LINDA KAYE MOORE

Decedent's Date of Death (if known):
 Decedent's Last Mailing Address:

2-27-19.
1454 GOLF TERRACE BLVD. APT. 1

Creditor:	<u>THOMAS P. MOORE</u>
Address:	<u>2216 WHITE PALM CT. FLORENCE SC 29506</u>
Telephone:	<u>843-661-1548</u>
Email:	
Original Creditor:	
Address (if different from above):	
Claim Amount Due:	<u>\$ 1/4 OF ATTORNEY FEES FOR REPRESENTATION OF PARENT ESTATE</u>
Account Number:	
Other Reference Number:	
Basis of claim (Ex: Contract, Services Rendered for decedent, etc):	<u>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.</u>
Date claim will become due (if not already due):	<u>UNKNOWN UNTIL APPEALS PROCESSES ARE FINISHED. ATTORNEY: PIERCE CAMPBELL</u>
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):	

FILE
 APR - 4 PM '19
 PROBATE COURT
 FLORENCE SC

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

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.

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



PRIORITY MAIL EXPRESS

To schedule free Package Pickup, scan the QR code.



USPS.COM/PICKUP



PS 1000100006

EP13F Oct 2018
OD: 12 1/2 x 9 1/2



CUSTOMER USE ONLY
FROM: please print
PHILLIP F. MOORE SR.
1504 PHAMOND DRIVE
FLORENCE, S.C. 29505

DELIVERY/OPTIONS (Circle or Check One)
 SIGNATURE REQUIRED Along the outer rim of the "Signature Required" box of the package. If the package is purchased Return Receipt Service, it is not required. The Postal Service will file the name of the addressee's delivery options.
 No Saturday Delivery (Scheduled next business day)
 Sunday/Holiday Delivery (Required (add \$24.00 fee, where available)
 10:30 AM Delivery (Required (add \$24.00 fee, where available)
Return to USPS (Send to Post Office) for availability

TO: please print
HONORABLE JENNY ABBOTT KITCHINGS
DEPUTY CLERK, S.C. COURT OF APPEALS
12 ROSENATE STREET
COLUMBIA, S.C.
29201
JAN 2 2019

PEEL FROM THIS CORNER



U.S. POSTAGE PAID
FLORENCE, SC
JAN 21 20
AMOUNT
\$25.50
R2304M109728-18



PAYMENT BY ACCOUNT (If applicable) U.S. or Foreign
USPS Corporate Acct. No. Federal Agency Acct. No. or Postal Service Acct. No.

POSTAL SERVICE USE ONLY
PO ZIP Code
Date Accepted (MM/DD/YY)
Time Accepted
Special Handling Fee
Weight
Delivery Address (Post Office)
Employee Signature

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail Express shipments. Please keep the inclusion of Federal law. This packaging is not for resale. EP13F © U.S. Postal Service, October 2018. All rights reserved.

* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMH and IMM at ps.usps.com for complete details.
† Money Back Guarantee for U.S. destinations only. * For domestic shipments, the maximum weight is 70 lbs. For international shipments, the maximum weight is 4 lbs.