

The South Carolina Court of Appeals

Jenny Abbott Kitchings, Clerk
or
V. Claire Allen, Chief Deputy Clerk

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

RECEIVED
JAN 30 2020
SC Court of Appeals

January 27, 2020

Dear Ms. Jenny Abbott Kitchings or Ms. V. Claire Allen,

I, Dennis Moore, am responding to the letter that I received back from you on January 23, 2020. Are you telling me that I do not have the right to file the paperwork on my father's estate when I am his son, the personal representative of the estate? David Durant, Jr. is my attorney, but I do not have to ask him or obtain his permission to do something. Mr. David Durant, Jr. has nothing to do with what happened to me concerning my father's estate. He wasn't involved during the 3 years that this case was in probate court. At that time, he was not representing me. What I don't understand is how the clerk of court filed all of the other letters without David Durant, Jr's say so. Now you are telling me that I have to have my attorney to file this letter and that I don't have the right to do so. I am sending this letter back to you. Whether you file it or not is left up to the clerk of courts. However, there is no law that says that I have to ask my attorney to file my paperwork. Why should I have to ask my attorney or pay him more money when I can file it myself? Now if there is a law that says you have the right not to file it when you were asked to do so, can you please email me a copy? I think I do have the right just like everyone else does and has done. If I cannot file this letter with the South Carolina Court of Appeals, then I will hold the clerk of court responsible for the outcome. The South Carolina Court of Appeals needs to know what happened to me during this probate. I need them to be aware of the way that I was treated in court. This should never happen to anyone. Please email Dennis Moore at PalmettoCars@outlook.com if you are not going to file this. Where are my rights in my father's estate?

Signed, Dennis Moore

Dennis Moore

COPY



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 23, 2020

Michael Dennis Moore
2222 W. Palmetto Street
Florence SC 29501

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 January 7, 2020. Our records reflect that Norwood David DuRant, Jr., Esquire, is your counsel of record. No motion to relieve counsel has been made either by the attorney or by you. Therefore, the correspondence dated January 7, 2020 is being returned to you.

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

COPY



The South Carolina Court of Appeals

1-7-20

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

RECEIVED

JAN 10 2020

SC Court of Appeals

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

COPY

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 1-7-20 I am Sending The South
Carolina Court of Appeals a letter trying to
EXplain what really happen during 2014-2016.

C. Norwood David Durant, JR Esquire

C. Pierce Campbell, Esquire

James Ross Snell JR. Esquire

Vicki D. Koutsoglannis Esquire

Francine Laura Lawhon

Phillip Frederick Moore

Thomas Paul Moore

RECEIVED

JAN 10 2020

SC Court of Appeals

COPY

1-7-20

Dennis Moore
2129 Kristen's Channel
Florence, SC 29501

RECEIVED
JAN 10 2020
SC Court of Appeals

The South Carolina Court of Appeals
In the Matter of the Estate of Thomas Gaddy Moore
Case No. 2018-001144

I am writing this letter to The South Carolina Court of Appeals. I am the son and personal representative of my father, Thomas Gaddy Moore's, estate. I hope and pray that The South Carolina Court of Appeals would please read this letter and take into consideration all that happened during my father's estate. This has been going on now for 7 years, and no one wants to talk about what happened to me, Dennis Moore, during the 3 years in probate. I have been to court a few times in my lifetime but I've never been to court in 59 years where I had to go up against a judge and an attorney that were from the same law firm. There was no way that I could have won this case with all of the odds that I had against me. You know this judge was not going to rule against his partner. Not when they used to practice law together in the same law firm of Turner Padgett. Also, they were both shareholders in the same law firm. Both of them knew better to do what they did. This is why I am asking the courts to please take this into consideration for suspension or disbarment of Probate Judge J. Munford Scott Jr. and his

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partner, the opposing attorney Cal Pierce Campbell for the actions that were taken and the rules and laws that they broke in South Carolina. The both are aware of the codes they have to go by. Now this judge is no longer a judge anymore. This judge is practicing law again with another law firm today. They both should have their licenses suspended or revoked for practicing law. They both knew better because they have been practicing law long enough. They both broke so many rules and laws during my father's estate and I hope and pray that the courts will punish them and not give them a free pass. What we know is that if a judge or an attorney declines recusal even though they are aware that proper grounds exist, then there can be significant repercussions. There should be punishment for both of them for not recusing themselves when there were grounds to do so. They both knew they were from the same law firm and both shareholders in that law firm, yet they thought they could pull this on me and nothing would ever be said about it or nothing would be done to them because they were a judge and an attorney. No one should be above the law. This is the reason we have rules and laws to go by. If you let them off with this then they will do it to someone else. They both had a personal connection with one another and they both had financial interests together. Now because of their dirty dealing with one another and the actions that they took, I have suffered. It cost me thousands of dollars. That should have never happened to me from the beginning and they both knew better. Why do you think the opposing attorney, Mr. Cal Pierce Campbell, called my attorney David Smith and wanted to cut a deal after the fact? Mr. Campbell found out that I was going to appeal the probate

COPY

Page 2

judge's decision then that is when he wanted to make a deal. He told my attorney David Smith to call his client, Dennis Moore, and tell him that he would be willing to drop all charges if I was willing to give his client, Thomas Paul Moore, my part of the estate. What Mr. Campbell is saying is that he is willing to give up \$699,388.00 that the judge put on me for \$100,000 my father wanted me to have, right? I told my attorney, David Smith, to tell Mr. Campbell no thank you-I will see you in court again. Right there this tells me that the opposing attorney doesn't even believe himself the way that the judge ruled because if everything in that order the judge wrote were true, you can believe one thing and that is that Mr. Campbell would have never made me this offer. The probate judge, J. Munford Scott, and his partner, the opposing attorney, Mr. Cal Pierce Campbell, knew that everything they did and said was based on hearsay. Even my brothers and sisters don't have legal documents from our father stating that Dennis Moore owes the estate one dime. It was not in my father's Will and they have no legal documents nor any promissory notes. How can you charge someone for something when you don't have anything legal? Everything they said that I owe came from them and not my father, Thomas Gaddy Moore. There were 4 or 5 other law firms that were involved in this case and no one could come up with anything. I would like to ask the courts for some reason, why did Mr. Campbell have all the answers? Now you figure that out. I don't understand how our courts in South Carolina would allow this to happen to someone and no prosecute them or punish them for their actions. If my father, Thomas Gaddy Moore, passed away in December of 2013 and he is not living

COPY

Page 3

today then how can you charge someone for something when he isn't here to speak up and tell the truth about everything? Again, if this judge or the attorney or my brothers and sister have anything legal from my father stating their case then please tell them to show the courts and myself. I would love to see it also. I did say something LEGAL from my father, stating their case.

I wrote a few lines about what had happened and took place during my father's estate. Please read.

Signed,
Dennis Moore

Dennis Moore

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Here are the reasons that I believe the judge and attorney should be disbarred or suspended because of the rules and laws that were broken. This judge and attorney had a duty of fairness when imparting justice as they both presided over this case.

- 1- We all know this probate judge, J. Munford Scott Jr., and the opposing attorney, Cal Pierce Campbell were both from the same law firm.
- 2- We also know the judge and attorney were shareholders in the same law firm of Turner Padgett. That is a fact.
- 3- We know this case involved a conflict of interest because they were partners and had a personal connection. They both also had financial interests in the result of the case.
- 4- What I don't understand is why this judge did not step down from presiding over this particular case and the same goes for the opposing attorney. I want to know if there are any federal or state laws in South Carolina that hold this judge and attorney accountable for not recusing themselves in my father's estate. This was nothing but a scam and a fraud between the two. We all know it and something needs to be done about it.
- 5- There was also a bribe in this case when the opposing attorney, Mr. Cal Pierce Campbell made me the offer and said to my attorney David Smith to tell Dennis Moore I would drop all charges against him if he would be willing to let my client Thomas Paul Moore have his part in the estate. Now if that is not trying to bribe someone then what would you call it? What Mr. Campbell is telling me

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Page 5

the order that my partner put on you I would be willing to drop it if you would give my client your money. He wanted me to give up my part of the estate that my father wanted me to have and just give it to him and his client Thomas Paul Moore. So Mr. Campbell is holding this order over me for my money.

- 6- You can read this order from this Probate Judge J. Munford Scott Jr. that he put on Dennis Moore and tell me whether he was biased, prejudice, and unfair. Everything that his partner the opposing attorney Mr. Campbell asked for, he got it. There was not one thing that he ruled in my favor. My attorney David Smith told me that we were blindsided in court. Also, Dennis Moore's appellant attorney, David Durant, who has been practicing law for 37 years, looked at me when he read the judge's order and said Dennis you know you were ambushed in court by the good ole boys. I don't know about the good ole boys, but I do know they were partners and shareholders. Not only did this judge rule in his favor with everything his partner asked for, but he also cut my personal representative commission from five percent of the estate to \$50 from the request of his partner, Mr. Campbell. The attorney for my father's estate, Mr. Porter Stewart, told me that it was a law that the personal representative of an estate get 5% unless they catch you in some kind of wrong doing of some sort of fraud. That is why I said this judge was biased, prejudice, and unfair.
- 7- Another reason I believe this judge broke the law is because this judge J. Munford Scott Jr. should have never

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Page 6

allowed Phillip Moore Sr. to go into his chambers and talk to him one on one without an attorney present. I sent The South Carolina Court of Appeals the letter where Phillip Moore Sr. wrote to Dennis Moore and stated that he went and talked to Judge Scott personally about this case. Phillip Moore said in his letter that Judge Scott agreed to meet with him. Whatever Phillip Moore told Judge Scott in their meeting in his chambers he said that Judge Scott agreed with him. Now, may I ask the SC Court of Appeals if that is legal for someone to do that without an attorney present? Is that the way that our courts are set up in South Carolina today?

8- This judge has broken so many rules and laws once again. This probate judge should have never allowed Phillip Moore Sr. to bring in a trash bag of new evidence on the final day of his ruling when I nor my attorney David Smith never had a chance to see what was in the bag and never had a chance to defend myself because this was the final day of his ruling. Phillip Moore Sr. own attorney told him that the judge was not going to listen to him because it was the last day, but he did. Now again is that legal?

9- I thought when someone send a letter or some sort of documents to the court and they filed it through the courts that every party was supposed to get a copy? Well I know for a fact that in my father's estate case there were tons of letters that were sent to Judge Scott by Phillip Moore Sr. and Thomas Paul Moore. I never got a copy of any of them from the court. I would love for you to read the letters where Phillip Moore Sr. was asking Judge Scott

COPY

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for his advice and also telling Judge Scott to please review all the evidence BEFORE the ruling. Then he also said that he took it upon himself to him the files to Judge Scott with his letters. I, as the personal representative of my father's estate, never got the letters or files that he wrote to Judge Scott that they were also partners.

10- The opposing attorney Mr. Cal Pierce Campbell lied to the courts. He said in his brief to the SC Court of Appeals that there was nothing unfair about this case. So Mr. Campbell doesn't think that everything that happened to Dennis Moore during the time we were in court was unfair? If you would please read the above paragraphs starting with 1 and continuing through 8 and you tell me that was not a dirty deal the way they treated me in court with my father's estate. All the dirty dealings they had and then the judge made Dennis Moore pay for his partner's attorney's fees. There is no way that I could have won this case because they were partners and they had a personal connection not to mention they were both shareholders.

11- If this probate judge or the opposing attorney Mr. Campbell are any of my so called brothers or sisters have any legal documents from our father stating that Dennis Moore owes the estate money then please show them to me. I did say LEGAL documents. I'm talking about a legal document or a promissory note from my father stating that I owe the estate one dime. I know for a fact my so called brothers and sister don't have any kind of letters from my father or other legal documents. Everything they have is hearsay. The reason that I said they don't have any

COPY

Page 8

legal documents is because they had not talked to our father in years before his passing. Our father would have never given them any legal documents against Dennis Moore. They were never around him until he passed away. Now they are all coming around to see how much money they can get. They have tried this before, Thomas Paul and Francine Moore. When our father was living they took him to court and they both used the same attorney. It did not work then and it is not going to work now. Everything they submitted to this probate judge was nothing but hearsay. If they have a legal promissory note or a legal document from my father please tell them to come forward and show it to the courts and me. My father nor I ever signed any legal documents stating that I owe him money.

12- I hope and pray that the SC Court of Appeals will read this letter that I am sending to you to tell this story about what happened to me during my father's probate court estate. I hope that you will award the five percent back to me that the law requires and not the \$50. Also, I hope and pray that I can get my attorney's fees back out of the estate because this was concerning the estate itself. There were so many rules and laws broken by this judge and they both should be suspended or disbarred.

COPY

Page (9)

MOORE

3401 Cranty Court
Florence, SC, 29501

COLUMBIA SC 290

24 JUL 2017 PM 11

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

29501-634629

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.

COPY

this helps 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 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 Moore Co 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 has ordered

COPY

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.

Here a letter where Phillip Moore SR,
took it upon himself and send files
to Judge Scott and I Dennis Moore
Never got copy's. And once again
they where also filed throw the courts
and I Dennis Moore never got copy's.

91:47:114 4-100516

COPY



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.

Here a letter Where Phillip Moore SR, told Judge Scott to please review this evidence before your ruling on the Probate. Dennis Moore never got the evidence from Judge Scott, And it was filed through the courts,

RECEIVED
JUDGE SCOTT
MARCH 9 AM 11:48

COPY

Phillip F. Moore Sr.
3401 County Court
Florence, S.C. 29501

COLUMBIA SC 290

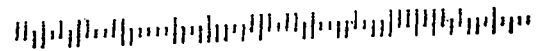
15 JUN 2015 PM 4:1



Bll

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

29501-343381



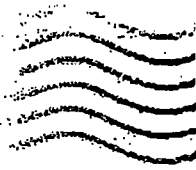
Here is Where Phillip Moore SR and
Thomas Paul Moore Was Writing letters
to Judge Scott.

COPY

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

COLUMBIA SC 292

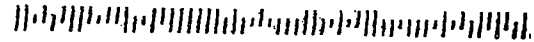
10 MAR 2016 PM 4 L



John

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

2950183456 0004



COPY

TURNER PADGET

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

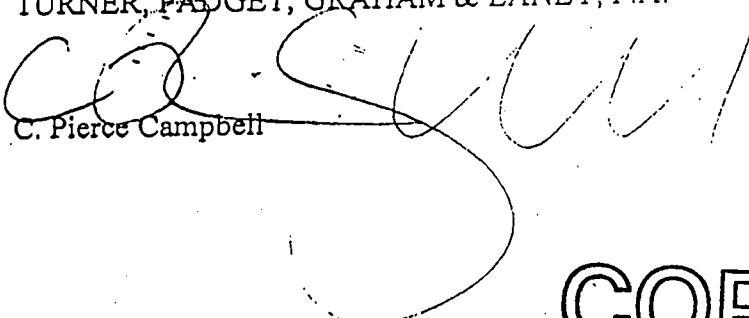
The next issue is how to deal with the church property in Richland County. I assume the estate will issue a Deed of Distribution of the decedent's interest to the five children equally. If any other plans for this property are contemplated, please let me know.

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

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

But his partner Judge Scott decided to Give Mr. Campbell client Thomas Paul Moore the church. When Mr. Campbell said in 2014 it should be equally to the Five children.

However, none of the parties submitted Requests for the Production of Documents to the others. Appellant's failure to do so and then face surprise at trial was a risk that he took in conducting the litigation. Nothing unfair occurred. The Appellant simply took a risk and then did not like the outcome when the risk failed to pay off. Exclusion of evidence through Rule 403, SCRE is not for this purpose.

COPY

COPY

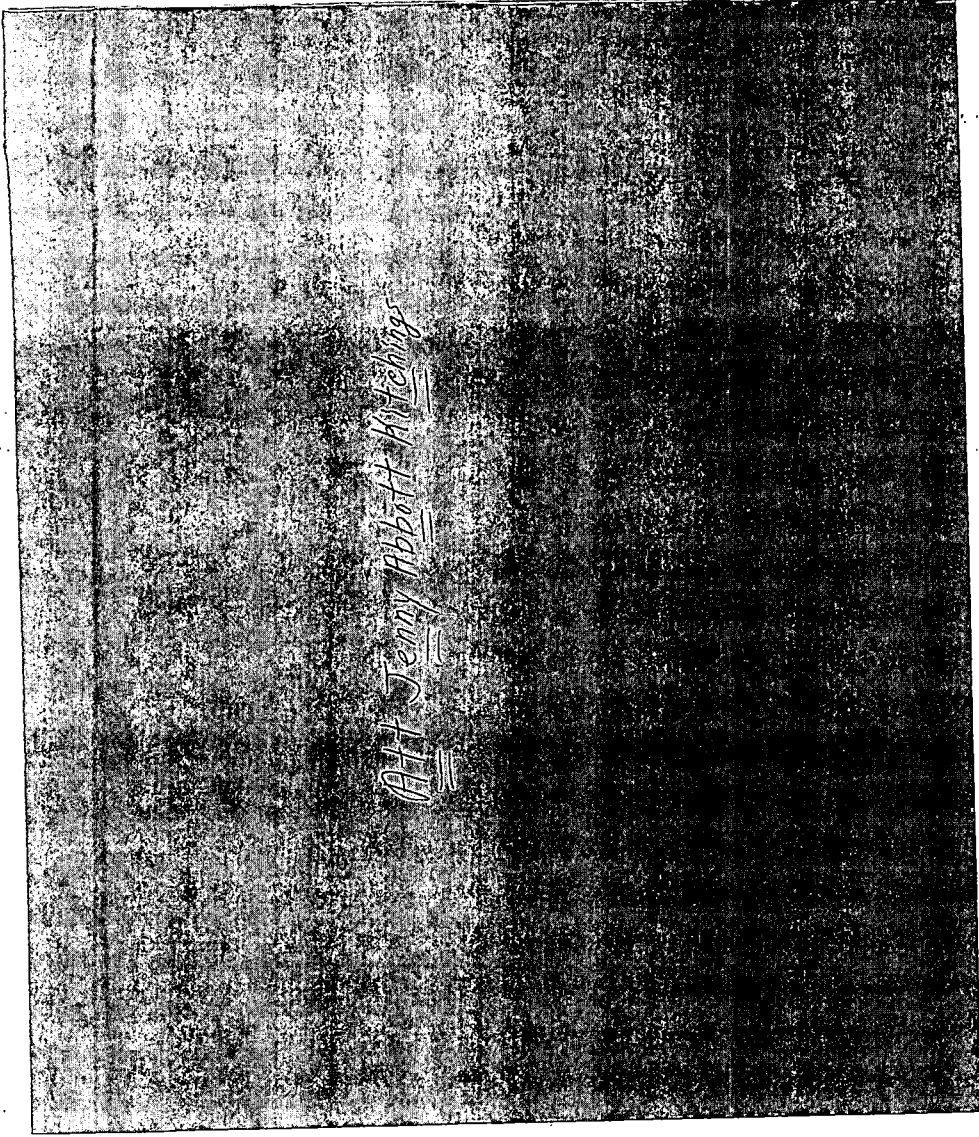
Mr. Campbell said in his Brief to The South Carolina Court of Appeals that there was nothing unfair occurred in the case of my father Thomas B. Moore Estate.

And he said that I Dennis Moore the Appellant simply took a risk and then did not like the outcome when the risk failed to pay off.

NO I Dennis Moore did not like the outcome when you have a crooked attorney and you had a partner the judge from the same law firm.

What I know today and what all took place there no way I could have won this case with both of you or partner.

Mr Campbell New the first day he took this case and walk into the court room he new right then that he was going to win this case because you new that your partner was not going to rule against's you. I notice in your Brief to the South Carolina Court of Appeals you never mention to the courts that both of you were from the same law firm and both of you practice law together and both were shareholders. For 3 years you never told no one. And there was nothing unfair.



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00018
00028

09596
fedex.com 1800.fedex 1800.453.3339
09046220

FedEx Package Express **US Airbill** 8102 7854 1043

MUR4
0215
Express Package Service

1 From
Date 1-9-2008
Sender's Name [Redacted] 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 Name Jonny Albert Holdings Phone 843 724-1670
Company SC Court of Appeals
Address 1522 South Street
City Columbia State SC ZIP 29204

4 Express Package Service
Next Business Day:
 FedEx First Overnight
 FedEx Priority Overnight
 FedEx Standard Overnight
2 or 3 Business Days:
 FedEx 2Day A.M.
 FedEx 2Day
 FedEx Express Saver

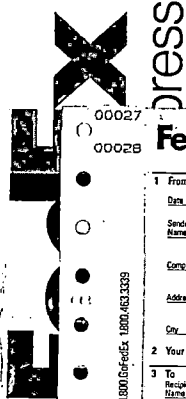
5 Packaging
 FedEx Envelope
 FedEx Pak
 FedEx Box
 FedEx Tube
 Other

6 Special Handling and Delivery Signature Options
 Saturday Delivery
 No Signature Required
 Direct Signature
 Indirect Signature
Does this shipment contain dangerous goods?
 No
 Yes
Payment: Bill to:
 Recipient
 Third Party
 Credit Card
 Cash/Check



0123741438
JAN 10 2008
SC Court of Appeals
8102 7854 1043
611

Do not ship liquids, blood, or clinical specimens in this packaging.



Extremely Urgent

FedEx
TRK# 0152 6185 2251

THU - 30 JAN 10:30A
PRIORITY OVERNIGHT

29201
SC-US
CAE

28 USCA



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FedEx Package
Express US Airbill
Tracking Number 8152 6185 2251

1 From
Date 1-29-20

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 803-924-1890

Company SC Court of Appeals

Address 1220 Senate St.

City Columbia State SC ZIP 29201



8152 6185 2251

FBI 487291 DELAWARE FL04 56422 FOR 10/15/20

FedEx Standard Overnight
 FedEx Envelope*
 FedEx Signature
 FedEx Signature Mail
 FedEx Signature Mail Priority
 FedEx Signature Mail Priority Overnight
 FedEx Signature Mail Priority Overnight International
 FedEx Signature Mail Priority Overnight International (Signature Required)

5 Packaging
 FedEx Signature Mail
 FedEx Signature Mail International

6 Special Handling and Delivery Signature Options
 Saturday Delivery
 No Signature Required
 Direct Signature
 Signature Mail
 Signature Mail International
 Signature Mail International (Signature Required)

7 Payment Method
 Recipient
 Third Party
 Credit Card
 Cash/Check

RECEIVED
IN 30 MIN
SC Court of Appeals

Insert shipping document here.

10:30
15:30
E
103
104

FedEx.com 1800.FedEx 1800.463.3339

019464466