

# 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 Lawton, Linda Kaye Moore, and Phillip Frederick Moore, Respondents

Appellate Case No. 2018-001144

11-10-20

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

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NOV 13 2020

SC Court of Appeals

Dear Mr. Kitchings,

I am totally devastated with Francine L. Lawton's letter 10-26-2020. I have NO idea WHY she wrote this letter. I have been helping Francine L. Lawton - Pro-De and Linda K. Moore as Pro-De's since Jan. 2019 submitting Briefs and Correspondences. I will NOT be sending ANYMORE Documents for Pro-De Francine L. Lawton. The Correspondence submitted 9-24-2020 was NOT ONLY for Francine L. Lawton Pro-De, They were ALSO on behalf of Pro-SE Linda K. Moore (Deceased). Even if Linda K. Moore - Pro-De is (Deceased) she has a right to be involved in her Parents Probate. I will keep defending her Interest in her Parents Estate until it is closed. Again, the Correspondence submitted 9-24-2020 was submitted on behalf of Linda K. Moore (Deceased) Pro-De.

I hope and pray  
the Judges Review  
this Correspondence.

Thanks

Thank you,  
Heir - Phillip F. Moore Jr.  
1504 Damon Drive  
Florence, S.C. 29505

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Appellate Case No. 2018-001144

The Honorable Judge Albert F. King  
Deputy Clerk, South Carolina Court of Appeals  
120 South Street  
Columbia, SC 29201

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SC Court of Appeals

Please file the original with the Court and file-stamp the copy for us and return same in the enclosed, prepaid, self-addressed envelope.

Thank you for your assistance in this matter.

Sincerely,

Phillip F. Moore Jr.  
1504 Paman Drive  
Florence, S.C. 29505

On behalf of one of the Heirs Linda K. Moore (Deceased), Phillip Moore would like to respond to the (Lies) that Francine L. Lawton stated in the 10-26-2020 - Correspondence - Incoming (Letter from Francine Lawton). Due to the fact that Phillip F. Moore retained James Small as his attorney, Phillip Moore was asked by Francine L. Lawton and Linda K. Moore Jan. 2019 to help them to submit their Briefs and Correspondences as Pro-De I agreed to help them to be involved in their Parents Estate in the Appeal. Now, 10-26-2020 Francine Lawton has stated (Lies) in this letter After Linda K. Moore has passed away Francine Lawton knew and authorized Phillip Moore in Jan. 2019 to help both of them with their Briefs and Correspondences. Please check the date on the computer 1-14-2019 - Initial Brief and 1-14-2019 Resignation of matter - Pro-De Heirs Francine L. Lawton, Linda K. Moore with Phillip F. Moore's Old address in 2019. My advice to Francine Lawton if she writes another letter DO NOT tear paper out of a composition book to send to the S.C. Court of Appeals. Please show that you are Educated.

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Kaye Moore, and Phillip Frederick Moore, Respondents.

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To: South Carolina Court Judges,

Retired and now at the age of 66, I never would have believed that the Heirs named in our parents Will would suffer and could Not get Justice and our rights to close our Parents Estate through our Court system in South Carolina entering into the 8<sup>th</sup> year. This Probate has caused anger and hate between the Heirs the 1<sup>st</sup> day this Probate Opened. Linda K. Moore has passed away without receiving a penny of the two million dollars Estate left by her Parents that Personal Representative Michael Dennis Moore has kept in his possession for 8 years. There was NO communication or love from her two brothers Dennis Moore or Thomas Moore towards Linda before she passed away. Linda's death did Not phase them at all. There is NO Doubt in my mind this Probate would have closed in 8 months if it were not for our two brothers. Personal Representative Michael Dennis Moore, his 5 different attorneys he retained and 9 months into the Probate our other brother Thomas P. Moore retaining Pierce Campbell to submit a illegal, un-dated, un-signed phoney letter that Thomas P. Moore typed himself. Thomas Moore kept this letter in his possession for 2 years and Pierce Campbell ambushed the remaining 4 Heirs the day of the Pec. 22, 2015 Hearing. The remaining 4 Heirs will testify under oath this letter was NEVER seen until the day of the Hearing Pec. 22, 2015. Through-out the Pec. 22, 2015 Hearing Pierce Campbell and Thomas Moore has committed Perjury with their lies and false statements about this phoney letter and where it was located.

Thomas Moore and Pierce Campbell are trying to commit fraud with this illegal, undated, unsigned letter for Thomas Moore to steal ALL the interest from the Property owned by our deceased Parents in Columbia, S.C. The Transcript itself of the Dec. 22, 2015 Hearing Proves their Lies and False statements, also their Lies and False statements greatly affected Judge Scott in his Order. Be Honest, why did Pierce Campbell make a Motion to the South Carolina Court of Appeals to Dismiss the Briefs of Philip F. Moore, Pro-SE Linda H. Moore and Pro-SE Francine L. Lawton. The reason was these Briefs were from the Dec. 22, 2015 Hearing and the testimony given by Pierce Campbell and Thomas Moore in Judge Scott's Order was Totally FALSE and UN-True. The remaining 4 Heirs will make our Pleas to the South Carolina Court of Appeals Judges to Return (ONLY) the Richland County Property back to ALL the 5 Heirs. If our Parents wanted the Richland County Property to go to Thomas P. Moore we have NO Doubt they would have stated it in their Will. Pierce Campbell and Thomas P. Moore did Not present ANY solid evidence that our parents gave this un-dated, un-signed, illegal letter to anyone. They only made False Accusation. Please read the Correspondence received 9-24-2020, these documents of Facts are Solely from the Dec. 22, 2015. There are NO NEW EVIDENCE in these documents 9-24-2020. All 5 Heirs Agreed how we were going to settle the issue of the Richland County Property at the meeting Before the Will was submitted to Probate Court. Now, 2 years later Thomas P. Moore changed his mind and retained his own Personal Attorney (Pierce Campbell) 9 months into the Probate, to take the Richland County Property for (Himself) from the other 4 Heirs.

STATEMENT OF ISSUES ON APPEAL

11-10-20

- 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?

4 of the 5 Heirs will agree with Judge Scott's Order on this Issue, due to the Facts and Findings in the Dec. 22, 2015 Hearing.

- 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?

4 of the 5 Heirs will agree with Judge Scott's Order on this Issue, due to the Facts, Findings and submission of evidence in the Dec. 22, 2015 Hearing.

- 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?

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 Pickland County Property will be settled. Nine months into the Probate after the meeting Thomas Moore has changed his mind with the Agreement All 5 Heirs made and broke his Promise and retained his own Personal attorney. This agreement was made Before the Estate Opened. 4 of the 5 Heirs will ask that the Issue on the Pickland County Property be Returned and settled by their Agreement they made Before the Probate Opened.

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How long will this Probate stay open? The Heirs of our Parents have suffered entering into the 8<sup>th</sup> year after their death. One of the Heirs - Linda K. Moore has passed away without receiving a penny of her part of the 2 million dollars Estate left by her parents. Our Parents made a Legal Will in the presence of a attorney. Their wishes in the Will states to divide their Estate Equal between their 5 children and if any of the Heirs pass away their part would go to their children. Making their Will out together having Trust in our Court System both believed and was convinced by making the Will that ALL 5 children would get their share of the Estate to enjoy without their part going to their children. The fact is making a Legal Will our Court System in the State of South Carolina has denied to grant our parents wishes and has denied Linda K. Moore (deceased) her part of the Estate entering into the 8<sup>th</sup> year. All of our Parents children are now at the age 66 to 70 years old. Will any of the remaining 4 Heirs receive and enjoy their part of the Estate before they PASS AWAY or be like Linda K. Moore their part go to their children? Our Court System has allowed our Personal Representative Michael Dennis Moore who has become a thief to retain 5 different attorneys to steal ALL of our Parents Estate, Michael Dennis Moore ALSO has refused to grant our Parents wishes keeping this Probate Open entering into the 8<sup>th</sup> year.

This Probate Case through our Court System has been a total disgrace towards our parents and their wishes in their Will. Defending our Parents Estate in Probate from day one against our Personal Representative Michael Dennis Moore now 8 months after the Probate Opened, Thomas P. Moore retained his Personal Attorney (Pierce Campbell) to submit a illegal, un-dated, un-signed letter to receive ALL the interest our parents owned in the Richland County Property in Columbia, S.C. The remaining Heirs will plea to the Court and Judges to Close this 8 year Probate and give us Justice and our Rights as Heirs to receive our part of the Estate by our parents wishes Before we Pass Away since day 1 becoming Personal Representative Michael Dennis Moore became a Thief as Judge Scott Prove this by his Order given Dennis Moore \$50.00 for his duty as Personal Representative in Probate Court in Florence, S.C. Dennis Moore is the worst P.R. we could ever have in a Probate.

As Personal Representative Michael Dennis Moore Controlled everything in the Estate including our Parents money in several Bank Accts they owned. Dennis Moore has used the 2 million dollar Estate for his own use.

Below I know for a fact how Dennis Moore has used the 2 million dollar Estate Personally for 8 years. This is why he is keeping the Probate Opened.

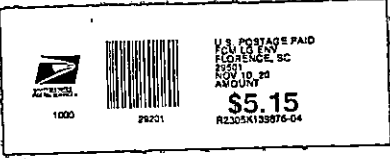
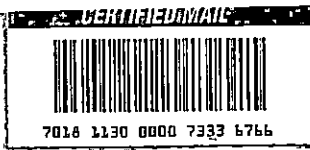
- (1) Dennis Moore has used this money to pay off the \$450,000.00 house he lives in.
- (2) His occupation is a Car Dealer, He has purchased a Car Lot 2222 West Palmetto St. Florence, S.C. paid in full \$100,000.00.
- (3) Dennis is using the 2 million dollar Estate Funds to buy and sell his vehicles to operate his business at 2222 West Palmetto St. Florence, S.C.
- (4) He has bought his middle aged daughter a House to live in paid in full \$125,000.00 when she got a divorce.

- (5) All the Personal vehicles & Family Drives are Paid in Full.
- (6) Dennis Moore has Lied through out the Entire Probate.
- (7) Dennis Moore has Retained 4 different attorneys Personally to represent him in this Probate to defend him in his Lies. Attorney Loman, Attorney Porter Stewart, Attorney David Smith and Attorney David Durant representing him NOW in South Carolina Court of Appeals.
- (8) Dennis Moore went in our Parents House after they Passed Away and emptied our parents safe and retrieved ALL the money in the safe without the other Heirs being Present.
- (9) after Dennis Moore went in our parents House by (Himself) The remaining Heirs found their mothers Jewelry Box empty with the Lock Broken.
- (10) Dennis Moore had a Signature Stamp made with our Fathers name Thomas G. Moores Signature to take money away from ALL of Thomas G. Moores Accts.
- (11) Again, it has been proven that Dennis Moore is a Liar and a Thief when Judge Scott awarded Dennis Moore ONLY \$50.00 in his ORDER for his Duty as Personal Representative.

LASTLY - OUR PLEA IS SOMEONE PLEASE STOP HIM  
AND CLOSE THIS PROBATE.

Thank you,  
Heir → Philip F. Moore Sr.  
1504 Pamun Drive  
Florence, S.C. 29505

Phillip F. Moore Sr.  
1504 PAMON DRIVE  
FLORENCE, S.C. 29505



Honorable Jerry A. Hitchings  
Deputy Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, S.C. 29201

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