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DEC 18 2020

SC Court of Appeals

The South Carolina Court of Appeals

To Jenny Abbott Hitchings, (Clerk)

Mrs Jenny IF you would please file this letter in RE: IN the matter of my Father Estate OF: Thomas Gaddy Moore Appellate Case NO: 2018-001144. I Dennis Moore are the son and the personal representative of his estate. It is also that this letter gets filed because my attorney not going to file it that is the reason that I Dennis Moore are asking the courts to file it and hand it over to the case worker that handle my father estate. It is urgent that The South Carolina Court of Appeals get this letter and read it. And IF their is any cost to the court please send me a billed.

Thank You

Dennis Moore

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Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

DEC 18 2020  
SC Court of Appeals

12-7-20

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

To the South Carolina Court of Appeals:

My name is Dennis Moore and I am the son and personal representative of my father's (Thomas Gaddy Moore) estate. My father passed away in December of 2013, right at Christmas time. You never know how much you will miss someone until they are gone. The reason that I am writing this letter is because I am hoping and praying that the South Carolina Court of Appeals would read it and review all the evidence and facts. My hope is that you will consider all that happened during the dealings with this estate. I hope and pray that someone in some sort of law enforcement agency or department of justice would investigate this case before the judges on the panel make a decision. I feel like the SC Court of Appeals need to know exactly what happened to me during day one in probate court between this probate judge, J. Munford Scott Jr., and his partner, Cal Pierce Campbell. We know for a fact that both of them had practiced law in Turner Padgett before he became a probate judge. Also, at one time, the probate judge and the opposing attorney were shareholders in the same law firm of Turner Padgett.

This case was nothing but a scam and a fraud between the two of them. We know for a fact that this case involved a conflict of interest. So much corruption and misconduct took place between the probate judge and his partner, the opposing attorney. The corrupt conduct and the rule of laws that they both committed throughout this entire experience is beyond me. They should both be ashamed of themselves. They are

supposed to be the ones who uphold the law. If we can't trust judges and attorneys who take our money, they what is the purpose of even going to court? I thought that was the reason to even go to court- to get justice. No one should have been treated like I was or done like this in a court of law.

They have both violated my rights as well as my opportunity for a fair and honest trial. They are both guilty and have broken so many rules of law. This is why I am asking you to please let someone investigate them and confront them both for what they have done. I hope and pray that you will consider suspending or revoking their license to practice law. They both should really be disbarred from practicing law because if you let them go free for what they have done to me, if they get a chance, they will do it again to someone else. They both have put me through hell for the past 7 years ever since my father passed away. I have not been able to sleep over the past 7 years knowing that I am unsure of what the outcome will be and because of how I have been treated for 7 years by this judge and attorney.

If you don't think I have been created liked a criminal, please read the other letter that I am sending you. Please read pages 1-12 and that will tell you about how dirty they both did me in court. Also, it will tell what happened to me during this time in probate court.

Let me tell you about my Appeals Attorney. This case was not only a conflict of interest once, but twice. This came about a second time when I hired my appeals attorney. Could someone please tell me what is going on with all the attorneys and the probate judge? Are they all corrupt, dishonest, and involved in misconduct? Let me explain what happened to me with my father's estate. I was scammed one, and then again by the actions of these crooked attorneys as well the probate judge.

I am so upset and disgusted with the way that these attorneys have handled my father's estate case and have not been truthful about anything they've said or done. The reason that I am asking the SC Court of Appeals to read the other letter that I am sending is because it has all

the evidence and facts that took place. What I can't understand is why Woody Durant, my appeals attorney, did not mention anything in his briefing to the SC Court of Appeals about what happened to me in probate court. Also, he did not mention one word to the circuit court Judge Russo. I did not understand why and now I know why he did not saying anything to the courts about the probate judge and the opposing attorney and it is because they were from the same law firm where his brother works. Woody did not tell me that his brother also works with Turner Padgett. How dirty and unlawful is that for an attorney to take your hard earned money and not tell you that their brother works with the same law firm that is suing you for \$699,388.00. Now you tell me how that is not a conflict of interest. That is crooked for an attorney to do someone like that. He also charged me \$30,000.00 for nothing. He had not said one thing to the courts about what happened to me during court.

My wife and I went out of town to hire an appeals attorney to represent me and prove my innocence. We drove 70 miles to get away from the corruption in Florence, SC and we ended up at the law firm of N. David Durant and Associates, PA Attorney at Law in Surfside Beach, SC. The attorney that my wife and I hired to represent me was Mr. Woody Durant. I told Woody and his father David Durant what happened to me while I was in probate court. I showed them where this probate judge and his partner the opposing attorney had said that I owe the estate \$699,388.00 and I told both of them about the judge and the attorney and how they were from the same law firm. Not only were they both from the same law firm, they both at one time were shareholders in the same law firm. So this law firm took my case and told me I would have to pay them \$20,000 up front. My wife, Crystal Moore, wrote their law firm a check for the money. A few weeks later, I met with Mr. Woody Durant a few times and we talked about the case. Then I had to write another check for their fees. I have paid their law firm close to \$30,000 to represent me. They won't even tell the truth about what happened.

The reason why I am telling the SC Court of Appeals about this is because the law firm that I hired the appeal's attorney Mr. Woody Durant his own brother works for Turner Padgett. Now you tell me how dirty is that for an attorney to take almost \$30,000 of your hard earned money and never say a word about your brother working with Turner Padgett. His father, David Durant, did call me 6-8 months later and told me that he "meant to tell me" about his son, Ross Durant, working with Turner Padgett. I did not know what to say. I was so upset that this law firm took my \$30,000 and did not tell me this up front on the first day I walked into his office. They knew if they would have told me that Woody's brother and David's son worked with Turner Padgett that I would have never hired them as my attorney to represent me because that is a conflict of interest also. They should have told me the first day that I walked into their law firm and told me about their brother/son before they took one dime of my money and let me decide whether or not I wanted to hire them or not.

You tell me, would anyone have hired this law firm knowing that their brother works with the same law firm that is suing me for \$699,388.00. That is wrong. I feel like they need to give my money back to me because of the way they handled this case and the action that they took. They have really not done anything for me. I told Mr. Woody Durant at least 100 times about the probate judge and the opposing attorney and he never mentioned it one time to the Circuit Court Judge Russo or the South Carolina Court of Appeals. If he would have done his job and brought all the evidence and facts out in this case and told the judge about the conflict of interest I would not have to write letters to the South Carolina Court of Appeals. Mr. Woody Durant is not going to tell the courts because of his brother working at the same law firm at Turner Padgett. The circuit court Judge Russo would have had no choice but to throw this case out because of the conflict of interest. My attorney Woody Durant had the chance but did not say one word about it because he knew that his brother also works with that same law firm. When we were in court, Judge Russo said in his ruling that the reason that Mr.

Moore and his attorney Woody Durant lost is because there was no new evidence presented by them. Why? I had told him 100 times and Woody ignored me.

Woody Durant wrote me a letter on October 26, 2020 and said my brother Ross Durant began working as an attorney with Turner Padgett in August of 2018 which was a year and seven months after I retained their law firm. However, I told my appeals attorney Woody Durant that not so, that is a lie because according to what is posted on the internet for the entire world to see is that your brother Ross Durant worked full time for Turner Padgett as a law clerk for two summers while he was in law school and he was pleased to join as a full time associate upon graduating. Now I know why Woody Durant did not mention anything about the probate judge and his partner the opposing attorney because he knew at that time that his brother also worked with Turner Padgett and did not tell me until 6-8 months later.

If Woody Durant would have told me or if I would have known that his brother or any of his family members had any connections with the law firm of Turner Padgett I would have never hired him or his law firm. They did not say one word until they scammed me out of my money and that is not right. They need to give my money back because they were dishonest and not truthful the entire time.

As the personal representative of my father's estate, I would like to know where is the proof and the evidence and facts from my father himself where he says that his son (me) owes him money or the estate money. Do the courts have any of that from my father, Thomas Gaddy Moore? No, they don't. They don't even have any letters or legal documents or promissory notes from my father Thomas Gaddy Moore stated in their case. If this probate judge or his partner the opposing attorney don't have anything from my father that is a legal document then how can they charge me for something when my father is not here to tell you the truth. This is hearsay. They said and made up between the two of them because remember they are both from the same law firm and both were shareholders. Also, I do know that they are not honest

people. If Mr. Campbell thought that I was guilty of everything the judge wrote in his ruling well then tell me why would he drop all the charges against me if I would be willing to give his client Thomas Paul Moore my part of the estate. Now answer that. Then Mr. Campbell said in his briefing to the South Carolina Court of Appeals that nothing was unfair in this case. So what he was really saying was that what him and his partner the probate judge did there were no laws and no rules broken by him or his partner. Also, now it's pretty low down and dirty for an appeals attorney to take \$30,000 of my money and his brother works with Turner Padgett. It is also dirty for a probate judge to rule on a case when he knew his partner were from the same law firm of Turner Padgett. I hope and pray the courts will do the right thing.

Thank you,  
Dennis Moore

# Please INVESTIGATE

12-6-20

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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- 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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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

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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

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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.

*Thank You  
Dennis Moore*

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From: [Redacted]

Ship To: DANIEL MOORE Phone: 843 240-1023

Company: PALMETTO CASE OF FLORENCE LLC

Address: 2022 W PALMETTO ST

FLORENCE SC 29501-4047

Buyer Reference: [Redacted]

Ship To: [Redacted] Phone: 803 234 1717

Company: SC Court of Appeals

Address: 1200 Senate St.

Address: [Redacted]

Address: [Redacted]



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