

93777

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM FLORENCE COUNTY  
CIRCUIT COURT

RECEIVED

JAN 15 2021

Thomas A. Russo, Circuit Court Judge

SC Court of Appeals

---

APPELLATE CASE NO. 2018-001144

---

IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)

Michael Dennis Moore.....Appellant,

v.

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

---

MOTION TO BE RELIEVED AS COUNSEL

---

Norwood DuRant, Jr., Esquire  
Law Offices of N. David DuRant  
P.O. Box 14722  
Surfside Beach, SC 29587  
Phone: (843) 650-7800  
Fax: (843) 650-8090  
Attorney for Appellant

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

JAN 15 2021

SC Court of Appeals

---

APPEAL FROM FLORENCE COUNTY  
CIRCUIT COURT

Thomas A. Russo, Circuit Court Judge

---

APPELLATE CASE NO. 2018-001144

---

IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)

Michael Dennis Moore.....Appellant,

v.

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

---

MEMORANDUM IN SUPPORT OF MOTION  
TO BE RELIEVED AS COUNSEL

---

The undersigned counsel for the Appellant respectfully moves this Court for an Order to be relieved as counsel for Appellant and states as follows:

The appeal brief for the Appellant has been timely filed.

Consistent with Rule 407 of the South Carolina Appellate Court Rules and, specifically, Rule 1.16(b) of the Rules of Professional Conduct, there is at least one ground which supports the permissive withdrawal of the undersigned counsel. Such ground includes:

1. Sub-part (b)(6): the representation has been rendered unreasonably difficult by the client.

The following letters from the Appellant are hereto attached as Exhibit "A" in support of this Motion:

1. Letter to the Appellate Court dated December 7, 2020;
2. Letter to the undersigned dated January 5, 2021
3. Listing dated January 5, 2021
4. Letter to the Appellate Court dated January 7, 2021

The irreconcilable differences between the Appellant and the undersigned have continued to subsist despite good faith attempts to achieve a resolution.

The undersigned believes that his withdrawal can be accomplished without material adverse effect on the Appellant's interests.

This Motion is made pursuant to Rule 240 of the South Carolina Appellate Court Rules and any other applicable statutory or case law.

Appellant respectfully requests that this Court enter an Order:

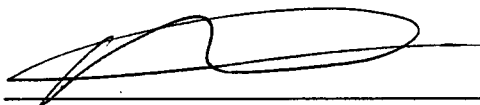
1. Allowing the undersigned to withdraw from representation of and be relieved as counsel for the Appellant; and,
2. Granting such other and further relief to which this Court finds the undersigned otherwise entitled.

Respectfully submitted,

Dated at Surfside Beach, South Carolina, this 11<sup>th</sup> day of January, 2021.

Norwood D. DuRant, Jr., Esquire (SCB# 101723)  
Post Office Box 14722  
Surfside Beach, South Carolina 29587  
Telephone: (843) 650-7800  
Facsimile: (843) 650-8090  
Email: norwooddurant@lawofficesofdurant.com  
ATTORNEY FOR APPELLANT

By: \_\_\_\_\_



**Norwood D. DuRant, Jr. Esquire**

**“A”**

Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

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

**COPY**

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

COPY

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.

COPY

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.

COPY

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

COPY

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

*Dennis Moore*

COPY

Law Offices of N. David Durant & Associates, PA  
Attorneys at Law  
Post Office Box 14722  
Surfside Beach, S.C. 29587

1-5-21

Attn: Mr. Woody Durant

The reason that I am writing you this letter is because you are the attorney representing me on my father's (Thomas Gaddy Moore) estate case-No: 2018-001144. I have written two letters and sent them to the SC Court of Appeals for them to file the letters on my father's estate. They stated that they could not file the letters on my father's estate and they could not accept pro se filings from a represented party. I am sending you a copy of the letters that I received back from the South Carolina Court of Appeals. They stated that I must consult with my attorney about filing a motion pursuant to Rule 240 of the South Carolina Appellate Court Rules (SCACR). They stated in the letter that they will not take any further actions on my filings unless they are submitted by my attorney. Woody, you are my attorney and I want you to file these two letters that I am sending you. These are the same letters that they would not file for me because they said I would have to get my attorney to file them. I have now asked you 100 times to tell the courts what happened to me during probate court with the crooked Probate Judge and his cooked partner that were both from the same law firm. Both were shareholders in the same law firm. Not once did you tell the circuit court judge about them nor did you mention them to the South Carolina Court of Appeals in your briefing that you sent them. This is pivotal information in this case that was not shared. I want them to know all of the details in regard to what happened to me during this experience with my father's estate. I feel strongly as though you should have mentioned this to Judge Russo in Circuit Court and I am concerned that you do not do this. If you would have mentioned this, he would have had no choice but to throw this case out because of the conflict of interest. The South Carolina Court of Appeals needs to be made aware of this information as well even if you do not feel as though it is pertinent. I would like to you file these papers immediately because you are the attorney representing me and my livelihood. They need to be made aware of everything that has happened to me from day one. If for some reason you do not file these papers, then I am holding your law firm and you responsible for this because I have asked you to do this, or rather begged you to do this, on multiple occasions and you have ignored my request to do so. I really do believe that the reason you did not mention this to the courts is because you knew from the beginning that your brother Ross Durant worked with the same law firm that is suing me for \$699,388.00 and if that is the case then that is also wrong. The courts and judges need to know what happened to me. They need to know the truth and let them

COPY

decide what to do next with that information. I am leaving this up to you, my attorney, to tell them the truth.

If you need to get in touch with me, you can text me or email at [PalmettoCars60@yahoo.com](mailto:PalmettoCars60@yahoo.com) or respond via mail.

Thank you,  
Dennis Moore

*Dennis Moore*

COPY

1-5-21

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

COPY

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

COPY

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

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

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.

*Dennis Moore*

COPY

1-7-21

Dennis Moore  
2129 Kristen's Channel  
Florence, SC 29501

The South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
RE: In the Matter of the Estate of:  
Thomas Gaddy Moore  
Appellate Case No. 2018-001144

Dear Ms. Jenny Abbott Kitchings,

I am responding to the letter that I received from you on December 31, 2020. I would like to share my stance by asking the Clerk of Court to file my two letters. They rejected my request, so now I am doing what you told me to do. I have sent both of my letters to my attorney, Woody Durant. I asked him to file them for me on my behalf. If he refuses to file the letters upon my request, what should my next step be? If the Clerk of Court won't file my letters and my attorney won't file my letters, I need to know next steps as far as getting the information to the judges on the South Carolina Court of Appeals. This is urgent as they need to know what happened to me throughout this case and these are facts that were never mentioned in court. This information has a lot to do with the outcome of the case. If you all want to silence me in regard to

Second letter

COPY

the case, then all I am asking is that everyone do their job and file the letters. That is all that I am asking. If I cannot come up there myself and explain to the judges what happened to me, then I would like this information put in writing for them. This is what the Attorney Cal Pierce and his partner, The Probate Judge J. Munford Scott Jr. did. I need to know if this was legal. Did they have to right to do that to me? From day one, I never knew they were from the same law firm and someone should have mentioned that to me. If the judges on the panel of the South Carolina Court of Appeals said what they did was legal and they had the right to do that, then I will disagree but accept it.

If my attorney, Woody Durant, doesn't file the letters and the courts refuse to file them as well then I am holding someone responsible because that is not right.

Thank you,  
Dennis Moore

*Dennis Moore*

COPY

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

RECEIVED

JAN 15 2021

The Honorable Thomas A. Russo, Circuit Court Judge

Court of Appeals

APPELLATE CASE NO. 2018-001144

IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)  
Michael Dennis Moore.....Appellant,

v.

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

CERTIFICATE OF COUNSEL

The undersigned certifies that this Motion to be Relieved as Counsel complies with Rule 240 of the South Carolina Appellate Court Rules.

January 11, 2021



Norwood DuRant, Jr., Esquire  
Law Offices of N. David DuRant  
P.O. Box 14722  
Surfside Beach, SC 29587  
Phone: 843-650-7800  
Fax: 843-650-8090  
Attorney for Appellant

Other Parties of Record:

Michael Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

C. Pierce Campbell, Esquire  
Turner Padget  
P.O. Box 5478  
Florence, SC 29502  
Attorney for Defendant Thomas Paul Moore

Francine L. Lawhon  
2005 Third Loop Rd.  
Florence, SC 29501

Linda K. Moore  
1454 Golf Terrace Blvd.  
Florence, SC 29502

James R. Snell, Jr., Esquire  
123 Harmon Street  
Lexington, SC 29072  
Attorney for Respondent Phillip F. Moore

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM FLORENCE COUNTY  
CIRCUIT COURT

Thomas A. Russo, Circuit Court Judge

RECEIVED  
JAN 15 2021  
SC Court of Appeals

---

APPELLATE CASE NO. 2018-001144

---

IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)  
Michael Dennis Moore.....Appellant,

v.

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

---

**PROOF OF SERVICE**

---

I certify that I have served a copy of the Motion to be Relieved as Counsel by depositing a copy in the United States Mail, postage prepaid, on January 11, 2021, addressed to The Deputy Clerk, South Carolina Court of Appeals, 1220 Senate Street, Columbia, SC 29201 and by depositing a copy of same in the United States Mail, postage prepaid, addressed to the following:

Michael Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

C. Pierce Campbell, Esquire  
Turner Padget  
P.O. Box 5478  
Florence, SC 29502  
Attorney for Respondent Thomas Paul Moore

Francine L. Lawhon  
2005 Third Loop Rd.  
Florence, SC 29501

Linda K. Moore  
1454 Golf Terrace Blvd.  
Florence, SC 29502

James R. Snell, Jr., Esquire  
123 Harmon Street  
Lexington, SC 29072  
Attorney for Respondent Phillip F. Moore

January 11, 2021



---

Norwood DuRant, Jr., Esquire  
Law Offices of N. David DuRant  
P.O. Box 14722  
Surfside Beach, SC 29587  
Phone: 843-650-7800  
Fax: 843-650-8090  
Attorney for Appellant

LAW OFFICES OF N. DAVID DuRANT AND ASSOCIATES, P.A.  
ATTORNEYS AT LAW

N. DAVID DuRANT, SR.  
NORWOOD D. DuRANT, JR.

SURFSIDE BEACH, SOUTH CAROLINA OFFICE  
1801 GLENN'S BAY ROAD (29575)  
POST OFFICE BOX 14722 (29587)  
SURFSIDE BEACH, SOUTH CAROLINA

TELEPHONE: 843-650-7800  
LITIGATION FAX: 843-650-8090  
REAL ESTATE FAX: 843-650-8077  
LITIGATION EMAIL: [litigation@lawofficesofdurant.com](mailto:litigation@lawofficesofdurant.com)(Lynn)  
[paralegal@lawofficesofdurant.com](mailto:paralegal@lawofficesofdurant.com)(Gladys)  
PROBATE EMAIL: [cjudge@lawofficesofdurant.com](mailto:cjudge@lawofficesofdurant.com)(Christina)  
REAL ESTATE EMAIL: [durantre@lawofficesofdurant.com](mailto:durantre@lawofficesofdurant.com)(Stacy)  
[tfullwood@lawofficesofdurant.com](mailto:tfullwood@lawofficesofdurant.com)(Terri)

January 12, 2021

**Via USPS Mail**

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

**RE: Michael Dennis Moore v. Thomas Paul Moore, et al.  
Appellate Case No. 2018-001144**

RECEIVED

JAN 15 2021

SC Court of Appeals

Dear Ms. Kitchings:


Enclosed, please find an original and six (6) copies of our Motion to be Relieved as Counsel including Certificate of Counsel and Proof of Service for filing, and a check for \$50.00 as and by way of filing fee.

By copy hereof, all parties to this action have been served with an unlocked copy of the Motion. Once these documents have been filed, we will forward a clocked copy to all parties.

Thank you for your assistance in this matter. Please do not hesitate to call us if anything further is required.

In kind regards, I remain

Sincerely yours,



Norwood D. DuRant, Jr.

Enclosures

cc: .

Dennis Moore (via US Mail)  
C. Pierce Campbell, Esquire (via US Mail)  
Francine L. Lawhon (via US Mail)  
Linda K. Moore (via US Mail)  
James R. Snell, Jr., Esquire (via US Mail)

neopost<sup>®</sup>

PRIORITY MAIL

01/12/2021

US POSTAGE \$008.25<sup>0</sup>



ZIP 29575  
041L10248834

LAW OFFICES OF N. DAVID DURANT  
AND ASSOCIATES, P.A.  
Post Office Box 14722  
Surfside Beach, South Carolina 29587

TO:

Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RECEIVED

JAN 15 2021

Court of Appeals