

The South Carolina Court of Appeals **RECEIVED**

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

JAN 19 2021

RE: Michael Dennis Moore vs. Thomas Paul Moore  
Appellate Case No. 2018-001144

January 18, 2021

Dear Ms. Jenny Abbott Kitchings,

I am writing this letter to the South Carolina Court of appeals. As you may be aware, my attorney, Woody Durant has filed a motion to be relieved as counsel in this appeal. If you would, please file this letter for me in response to the letter that I received from my attorney, Woody Durant. My attorney has made accusations against me and the courts need to know my side of the story before they rule on this case. If there are any costs for filing this letter for me, please forward the bill to me and I will send payment to the courts. As of now, January 11, 2021, I no longer have an attorney to represent me. I am going to have to file all papers myself.

Thank you,  
Dennis Moore

*Dennis Moore*

RECEIVED

JAN 19 2021

SC Court of Appeals

January 18, 2021

Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

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:

I am writing to you a letter in response to a letter that I received from my attorney Woody Durant on January 12, 2021. My attorney stated that he filed a motion to be relieved as counsel in this appeal as it has become clear that they can no longer represent me as a client due to my false accusations against them and their law firm. I would like the SC Court of Appeals to know that I did not fire my attorney, Woody Durant. I have too much invested in this law firm. I have already paid them right at \$30,000 to represent me and prove my innocence. If Woody Durant quits this case, he did that on his own. This has nothing to do with false accusations against him or his law firm. You can read the letters that Woody Durant sent to the SC Court Appeals. That's all I ever said to him- that I wanted him to file my letters with the SC Court of Appeals and let them know what all took place during probate court, circuit court, and the SC Court of Appeals. I never made any false accusations about Woody Durant or his law firm. Everything I have said has been the truth. I stated in the letters that he filed for me was everything that happened from day one in probate court until now. This is why I asked Woody Durant to please file these letters with the South Carolina Court of Appeals. They need to know what happened from the beginning. I am sorry if Woody feels like these are false accusations, but this is nothing but the truth and explaining everything that has happened to me since this has been in court. All I ever wanted was for Woody to ask the judges on the panel of the South Carolina Court of Appeals to tell me if everything that happened to me was legal and did the probate judge and his partner the opposing attorney have the right, by law, to do what they did to me. That's all I have been asking- was this legal? There was no way that I could have won this case no matter what attorney that I had or how many. Woody is talking about false accusations against him and his law firm but now you know how I feel when I ask your law firm to bring up all the false accusations against me and you never said one word about it. You knew all about

it because I told you from the first day that you and your law firm took my money. Woody stated in his letter that I received from him on January 12, 2021, he said from the very beginning of this appeal in January 2017 all the way to January 2019 when their final brief was submitted that he and Davis emphatically stated that they did not include these accusations in their arguments and brief and further, it is clearly demonstrated throughout two years of filings and submissions that this was not going to be included in our appeal. Woody, please don't lie to the courts. The only thing you and your father David told me and my wife the first day that we walked into your office your father David Durant read the order that the probate judge ruled against me and your father David said himself that he believed I was ambushed in court by the "good ole boys" and that the old judge needed to retire any way. Woody, you nor your father ever mentioned to me or my wife when we were in your office that your brother Ross Durant worked with Turner Padgett. You also never told me up front, and my wife was sitting right there, that you weren't going to mention anything about this probate judge or opposing attorney. If your father is telling myself and my wife that I was ambushed by the courts and by the good ole boys, then why would YOU not tell the courts about what happened and the way that I was ambushed? Why?

Woody, do you really believe that if you would have told me and wife the day that we walked into your office for the first time and before you took a dime of our money that you were not going to mention one thing about this probate judge or the opposing attorney, do you really believe that I would have hired your law firm that day? I don't believe that you will get anyone to believe those accusations; not when your client has a \$699,388.00 order on him. Do you really believe that myself or anyone else would have hired your law firm and paid you close to \$30,000 on those terms? Do you really believe that when there are plenty of law firms all over South Carolina?

Woody, you said in your letter that you wrote to me you said yourself when you were asked about your brother working with Turner Padgett you said in your letter that my brother Ross Durant did not come to work with Turner Padgett until August of 2018 which was a year and seven months after I retained your office. I told Woody that was a lie because you can look on the internet and it tells you when his brother Ross Durant was working with Turner Padgett.

If Woody Durant and his law firm would have been honest and truthful and told me and my wife the first day we were in his office that his brother Ross Durant was working with or doing an internship with Turner Padgett the same law firm that was suing me for \$699,388.00 then I would have never written him a

check for \$20,000 up front because that would have also been a conflict of interest. My wife and I would have gotten up right then and left that office. I know with his brother working for or at the same law firm that is suing me is not going to look after his client's best interest knowing his brother works there. I would also not want him to be an attorney for me knowing his brother worked there. Again, if Woody would have told me and my wife "look here, I will take this case but I'm telling you up front before me or my law firm take one dime of your money, I am not going to mention anything about this probate judge or his partner the opposing attorney". I would have gotten up right then and told him that I would find another law firm if that was the case. He never mentioned one word about it again. Does he really believe I would have hired his law firm on those terms?

Woody Durant's father, David, did call me 8 months later after the fact and said to me that he meant to tell me that his son Ross also works with Turner Padgett. At that time, I did not know what to say or do. I had already paid them \$20,000 up front and now he was telling me about his son. Why didn't Woody or David not tell me this the first day that I gave them my money? I think everyone knows why they did not tell me this beforehand and before I gave them that check. He said now he's got someone on the inside. I think he thought that was going to make me feel better. I don't understand for the life of me how these attorneys and probate judges can do people like this without any repercussions. Maybe this is the way the law has become.

Woody, you want to write the courts and tell them that I am making false accusations against you and your law firm and that you are filing a motion to be relieved as counsel in this appeal. You should be ashamed of yourself taking \$30,000 of your client's money and won't tell the entire truth. I have never asked you to lie for me or do something that was not legal. All I have ever asked you and your law firm to do was to tell the courts the truth and tell them what happened to me from day one until now and you have not fully done that for your client.

Also Woody, because you would not speak up for your client, this is the reason that we lost in circuit court before Judge Thomas A. Russo. The judge himself in circuit court said the reason that I lost and my attorney lost was because no new evidence was presented by us. Why did you not tell them about the probate judge and his partner the opposing attorney and how they were from the same law firm and they were both shareholders in the same law firm? I know why you did not tell them because at the time you also did not tell me and my wife that you brother Ross interned with and worked with Turner Padgett. That

was the reason you could not protect your client because of your brother. If you would have only told Judge Russo about what took place he would have had no choice but to throw this case out because of the conflict of interest. I would have not have had to write all these letters if you would have done your job like you are supposed to do for your client.

This is why I am asking the SC Court of Appeals to make you give me my money back because you really haven't done anything on my behalf or that I've asked you to do in regard to my father's estate.

Thank you,  
Dennis Moore

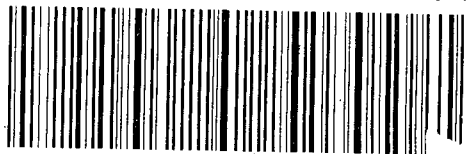
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1. From  
Date: 1-18-21  
Sender Name: DEBBIE MOORE Phone: 843 245-3893  
Company: PALMETTO CARS OF FLORENCE LLC  
Address: 2222 W PALMETTO ST  
City: FLORENCE State: SC ZIP: 29501-4047

2. Your Internal Billing Reference  
3. To Recipient Name: Jenny Abbott Kitchings Phone: 803 734 1240  
Company: S.E. Court of Appeals  
Address: 1220 Senate St.  
City: Columbia State: SC ZIP: 29201

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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  
 No  
 Yes  
 Yes  
 No  
 Yes  
 No  
 Yes  
 No

7. Payment Bill to:  
Sender:  Recipient  Third Party  Credit Card  Cash/Check  
Total Packages: Total Weight: lbs



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SC Court of Appeals

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