

**RECEIVED****Feb 10 2021****SC Court of Appeals**

Dennis Moore  
2129 Kristens Channel  
Florence, SC 29501

February 6, 2021

The South Carolina Court of Appeals  
In the Matter of the Estate of Thomas Gaddy Moore  
Case No: 2018-001144  
Phone 803-734-1890 or Fax 803-734-1839

I am writing this letter to The South Carolina Court of Appeals because I would like to address some of the false accusations and lies that my attorney, Woody Durant, made in his letter to The South Carolina Court of Appeals.

First of all, Woody Durant nor his father David Durant never once told me or my wife, Crystal Moore, the first day that we were in their office that him nor his father were not going to mention anything about the probate judge and the opposing attorney to the courts. I believe that is the biggest lie that Woody Durant has ever told. Does he believe that someone would have written him a check for \$20,000 on those terms? Who does he expect to believe that accusation? This was the whole reason that I hired his law firm from the beginning. My wife heard me tell him about the probate judge and his partner the opposing attorney and he never told me that he was not going to mention that to the courts. If he or his law firm would have told me that the first day I walked in the door that I would have never written him a check for \$20,000. I would have gotten up and left his law firm right then and there.

My wife and I both sat there the first day we walked into that office and told Woody and David all about what happened to me during probate court and what all had taken place. They both sat there as I was telling them about this probate judge and the opposing attorney and they never mentioned to me or my wife, Crystal Moore, about their own son/brother, Ross, working with the same law firm that is suing me. I would like the courts to know how dirty that is and how dishonest that is for a law firm that is suing me. They didn't tell me upfront that their son/brother works for the same law firm that is suing me for \$699,388.00. If Woody or David would have told me that Ross was interning or working for the same law firm that was suing me, I would have never written his law firm a check for \$20,000 knowing that he worked there because that is a conflict of interest. That should tell the courts that this law firm is crooked and dishonest from day one. Now if this law firm will be dishonest and not truthful to their client from day one before they took their clients' money, what do you think they would do after they have already got your hard earned money? Now if you

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don't think this law firm will lie to you and their clients, when I found out later on that Woody Durant's brother was working with the same law firm that was suing me I wrote Woody a letter and confronted him about it and the courts are welcome to read it. Woody wrote me a letter back and said in the letter that I had already hired their law firm for one year and six months before his brother Ross went to work with Turner Padgett. I told Woody that was a lie because on the internet it tells exactly when his brother went to work with Turner Padgett. All he was trying to do was lie and cover it up. Ross Durant worked full-time for Turner Padgett as a Law Clerk for two summers while in law school, and part-time during his final year of school, and joined the firm as a full-time associate upon graduating.

Woody Durant's father, David, did call me eight months later, after the fact and after he had taken my money and had already gone to circuit court, to tell me that he "meant to tell me" that his son Ross worked with Turner Padgett. At that time I did not know what to say or do because they had already taken my money. No, they'd already scammed me out of money. Then David stated that now they had somebody on the inside like that was supposed to make me feel better about Ross working there. There is another lie this law firm told their client. You know for a fact that David and Woody did not forget to tell me about their brother/son working with the same law firm that was suing for me \$699,388.00. This is wrong for any law firm to lie to their client or withhold information like that and do what they have done.

This is why I am begging the courts to please let someone in a law enforcement agency or department of justice to fully investigate this case. All I am asking is: did this probate judge Munford Scott Jr. and his partner, the opposing attorney, Cal Pierce Campbell have to right to do what they did to me? Was everything they did legal for them to do that? Based on their actions taken, were rules or laws broken in South Carolina? I've yet to get an explanation on this. They are all aware of the code and ethics they have to go by. Now this probate judge is no longer a judge any more. This judge is practicing law again with another law firm today.

This is what I hope and pray the courts will do the right thing and investigate this probate judge and the opposing attorney and also my appeals attorney Woody Durant because all he was doing was trying to cover up what the probate judge and the opposing attorney did. Why do I say that? Because he has lied to me about his own brothers connection to this law firm that is suing me and he lied to the courts saying that he told me up front that he was not going to say anything about the probate judge or the opposing attorney in court and he never told me or my wife, Crystal Moore, that from the beginning the day we were in his office.

My wife and I were in Woody's office the very first day and his father was reading the order that the probate judge had put on me. Then he looked at me and said, Dennis Moore, you do know you were ambushed in court by the "good

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ole boys" and that old judge needed to retire anyway. Now Woody, what I don't understand is, if your father David Durant told me and my wife Crystal that I was ambushed in court by the good ole boys well then why did you, Woody, not want to tell the circuit court judge and the South Carolina Court of Appeals about it also? Why? I think we all know why now. You were trying to cover up everything they have done. I also told you, Woody, to tell the courts about the offer that the opposing attorney C. Pierce Campbell made me, and you even failed to do that for your client. You knew it because I told you and your father David Durant about this the first day were in your office. Now I know C. Pierce Campbell had called my attorney David Smith after probate court was over and Mr. Campbell told my attorney David Smith and told him to call your client Dennis Moore and tell him I would be willing to drop all the charges against him if he would be willing to give his part of the estate to my client. Now Woody, doesn't that sound like he was trying to bribe me out of money that my father wanted me to have? What Mr. Campbell is telling me is the order that my partner put on you, I will drop it if you would give us your part of the estate. Now Woody, how come you did not tell the courts that also? Why? Woody, I also gave you a letter where my brother Phillip F. Moore wrote to me and said in his letter with his own handwriting that he went to the probate judge, J. Munford Scott's, chambers and talked to him one on one about this case. Phillip F. Moore said himself whatever they talked about that the probate judge agreed with him. Woody, you had that letter that I gave you. How come you did not put that in as evidence?

Woody, you don't think that was important to tell the courts for your client? If that was not important to you and your law firm Woody, well then why would you charge me \$30,000 if you were not going to do what your client asked you to do and tell the courts the truth? I know now why you did not want to tell the courts the truth and the whole story about what happened to your client, because you and your law firm were trying to cover it up because your brother was working with that law firm.

Woody, you said that I had written numerous letters to the South Carolina Court of Appeals. Well, if you would have been doing your job for your client and telling the courts the truth about what really happened and not trying to cover it up, then I would not have had to write any letters to the court. This whole time for four years you've had this case, now you decide to write a letter to the courts to file a motion to be relieved as counsel in this appeal because you said I was making false accusations against you and your law firm. Woody, if telling the courts the truth about what really happened to me during probate court and now with the South Carolina Court of Appeals, if that is false accusations, well I am sorry you feel that way. The only reason that you did file those letters for your client to the South Carolina Court of Appeals is because I told you that if you don't file them and let the courts know what really happened that I was going to hold you, Woody, and your law firm personally responsible.

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Finally, after 4 years you decide to give it to the courts. Now I hope and pray the courts will get someone in law enforcement or some sort of prosecutor to look into this case. This probate judge has put down for me to pay \$699,388.00 and also he wanted me to pay for his partner's attorney's fees and pay for Phillip Moore's attorney's fees. He was the one that went into the judge's chambers and talked to him one on one. Also, this probate judge said the personal representative's commission is \$50 and not the 5%. Did he really change the law and what the law requires? Woody, everything I said in this letter, you don't think this was important to tell the courts to try to defend your client? If that is the case then shame on you.

Woody, I have paid you and your law firm \$30,000 to defend me and to tell the courts the truth and everything that happened to me. Now that you've taken my money, all you and your law firm has done is nothing but lie to me and the courts. You and your law firm won't even do what your client asked you to do. All I ever heard you say was that I could not bring in new evidence. Then, the circuit court judge said the reason that Mr. Moore and his attorney lost was because no new evidence was submitted.

This will be the last letter than I am writing the South Carolina Court of Appeals. Whether or win or lose this case, I will respect your decision. All I would like the courts to do is to please get someone to investigate this case and let them determine if I am lying to the courts or if the probate judge and his partner the opposing attorney are lying to the courts. The reason that I am asking the court to investigate all this in this case is because the opposing attorney Cal Pierce Campbell said in his briefing that there was nothing unfair that occurred, so what he is telling the South Carolina Court of Appeals is that everything he and his partner did was legal. Also, I would like for them to investigate the appeals attorney because he took my money for nothing. He tried to cover up everything they had done.

If the courts decide to let someone in law enforcement or department of justice or some sort of prosecutor investigate this case, I would like for them to ask Mr. Pierce Campbell under oath if he told his client Thomas Paul Moore that he himself GUARANTEED Thomas Moore \$600,000 out of this case BEFORE the judge even ruled on the case. Also, ask his client Thomas Paul Moore under oath the same question and let's see who is going to lie. I know for a fact that Thomas Paul Moore called our sister Linda Kay Moore and told her that Pierce Campbell said that he would guarantee them he would get them \$600,000. Now there is only two things that had to happen. Pierce Campbell told their client that or his client is lying on his attorney. What I don't understand is how can Pierce Campbell tell his client that THREE months BEFORE the judge even ruled on the case? That tells you right there that somebody knows someone. If Pierce's client, Thomas Paul Moore, says "I don't remember" then let me refresh his memory. On September 3, 2016, Thomas Paul Moore called our sister Linda Kay Moore when Linda and I, Dennis Moore, were sitting at Jack's restaurant. We were

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both sitting there having dinner with my family and Linda's phone rang. She told me to look at the phone at who was calling her. It was Thomas Paul Moore. I told Linda we'd walk outside. I grabbed my phone and she grabbed hers. She put her phone on speaker and Thomas told her that Pierce Campbell called him and told him he guaranteed us that we would get \$600,000. Linda asked Thomas Paul how he could predict something like that when the judge had not even ruled on the case yet. Thomas Paul said he didn't know but that's what Pierce told him. I would be willing to bet you that Thomas called our brother, Phillip Moore, and our sister, Francine Lawhon and told both of them the same exact thing. I would ask them myself if you called the both of them but you know they both probably would not tell the truth. Maybe our sister, Francine, might tell the truth. If Pierce Campbell did call you or tell you that, I hope and pray you recorded him because in this day and time you can't believe any one, especially as evident in this case. If Pierce Campbell did not say that, then why are you lying on him because he is your attorney?

Thank you,  
Dennis Moore

*Dennis Moore*

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The South Carolina Court of Appeals

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

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Feb 10 2021

SC Court of Appeals

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

February 6, 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*

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attention to: Honorable Jenny Abbott Hitchings date: 2-6-21

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comments: IF you would please Filed this 2page letter With the South Carolina Court OF Appeals as you know my attorney Woody Durant has Filed a motion to be relieved as Counsel in this Appeal.

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