

April 26, 2021

The South Carolina Court of Appeals  
 In the Matter of the Estate of Thomas Gaddy Moore  
 Michael Dennis Moore Appellant,  
 Vs.

Thomas Paul Moore, Francine Laura Lawhon, Estate of Linda Kaye Moore, and  
 Phillip Frederick Moore, Respondents  
 Appellate Case No: 2018-001144

**RECEIVED****Apr 29 2021**

To The South Carolina Court of Appeals:

**SC Court of Appeals**

I, Dennis Moore, am the personal representative of my father, Thomas G. Moore's estate (Appellate Case No: 2018-001144). I received a letter from The South Carolina Court of Appeals that was filed on March 24, 2021 and the letter read that The South Carolina Court of Appeals has agreed with Dennis Moore Appellant attorney Norwood David Durant Jr. where he has filed a motion with the courts to be relieved as counsel for the Appellant. The South Carolina Court of Appeals said in the letter after we all have carefully considered, the motion is granted to the attorney Norwood David Durant Jr. I cannot believe that our courts, a panel of nine members judicial commission, would even allow or consider to let my attorney David Durant Jr. off this case, not when David Durant Jr. and his father David Durant Sr. has taken \$30,000 of mine and my wife's money. They both took our money and never said one word about his brother/son working and practicing law with the same law firm that is suing me for \$699,388.00. Now what The South Carolina Court of Appeals is telling me is that David Durant Jr. did not have to disclose to their client about his brother Ross Durant working and practicing law with the same law firm that is suing me for \$699,388.00 and that there was no ethical misconduct with the attorney or his law firm. Also, David Durant did not commit any conflict of interest just because his brother worked with practiced law with the same law firm that is suing me. If David Durant Jr. and his law firm did not commit ethical misconduct or have a conflict of interest and everything they did was legal and there were no codes or laws broken within this law firm then I can tell you that I am in a lot of trouble because my attorney took \$30,000 from his client and they have abandoned their client with his money. I know for a fact that this attorney refused to represent his client like he should have done during Circuit Court before Judge Thomas A. Russo and also The South Carolina Court of Appeals because his law firm has failed to disclose all the relevant facts in this case. David Durant Jr. was hiding evidence from the courts and did not want to tell the courts all that happened to his client during probate court. Not one time did this

law firm tell a judge about the probate judge and the opposing attorney being from the same law firm, not to mention they were both shareholders in the same law firm. David Durant Jr. did not even tell the courts that there was a bribe in this case also when the opposing attorney Mr. Campbell called my attorney David Smith and told him during probate court to call his client, Dennis Moore, because Mr. Campbell would be willing to drop all the charges against me, Dennis Moore, if I would be willing to give up my part of the estate to Thomas Paul Moore. Doesn't that sound like he is trying to make money or bribe me out of my money that my father left me in the estate, that he obviously wanted me to have. David Durant Jr. did not even mention one word of this to the judges or the courts about my brother Phillip Moore Sr. going into the probate judge's chambers and talking to him about this case without an attorney present. Whatever Phillip Moore Sr. told the judge, he said in his letter that the Probate Judge Mr. Scott agreed with him. Whatever he told the judge, the judge agreed with him. Now tell me that is legal.

I would like to ask the courts of The South Carolina Court of Appeals, a panel of nine members judicial commission, if my attorney, David Durant Jr. and his law firm refusing to represent their client by the laws of South Carolina and were hiding evidence and were failing to disclose all of the relevant facts in this case: How come my attorney David Durant Jr. did not argue his client's position? Nevertheless was neglecting to disclose all the facts and evidence in this case and neglected to disclose prior law for his client. The judge himself in the Circuit Court said the reason that Mr. Dennis Moore lost was because him nor his attorney did not bring forth ANY new evidence. Can you imagine if David Durant Jr. would have only told the courts the truth about what all had happened to his client and had given the courts all the evidence and facts in this case? If David Durant Jr. wanted to win this case for his client, all he would have had to do was tell the courts the truth and the facts in this case and the judge would have had no choice but to throw this case out because of the misconduct and conflict of interest. My attorney missed it.

It is amazing to me how David Durant Jr. and his law firm has had this case for 2017, 2018, 2019, 2020, and then in 2021 when I started questioning him and his law firm about his brother working with the same law firm that is suing me and questioning him about why he didn't tell the courts about the probate judge and his partner the opposing attorney, all of the sudden after 4.5 years he writes the courts a letter to The South Carolina Court of Appeals and tells them that I was making false accusations against him and his law firm. No, those were not false accusations. This was nothing but the truth and what all happened during probate court.

David Durant Jr. wrote a letter to his client and in the letter it said Dennis you said something about my brother Ross Durant working and practicing law with the same law firm that was suing you. David Durant said that was not so because I hired his law firm 1 year and 6 months before his brother went to work

with the law firm of Turner Padgett. I told David Durant was that a flat out lie because you can look on the internet and it will tell you when your brother went to work and practice law with the same law firm that is suing me. David Durant Jr. and his father David Durant Sr. knew the first day that my wife Crystal and I walked into their office in 2017 that their brother/son was working with Turner Padgett the same law firm that is suing me. Both of them did not say one word about it until they took my money and then they decided to call me about it 8 months later.

David Durant Sr. called me 8 months later after we'd already gone to Circuit Court and they both had already taken my money. David Durant Sr. confessed to their actions and told me that his son Ross Durant was working with Turner Padgett. He said I meant to tell you Dennis about my son but I forgot. Now you mean to tell me that David Durant Sr. and David Durant Jr. forgot to tell me about this until 8 months later after everything had already happened in Circuit Court and they'd already taken my money. You know that they both did not forget to tell me about their brother/son working with Turner Padgett on the very first day I walked into their law firm. David Durant Sr. said now we have someone on the inside who can help us out, like that was supposed to make me feel better after they'd already taken my money. They both knew from the beginning on day one if they would have been honest and truthful to me and told me about their brother/son I would have never hired their law firm on those terms but yet they kept this a secret.

Tell me if that is fair to me and that's not taking my rights away from me. If I cannot prove nine judges on the panel of the judicial commission with all the evidence and facts that I have concerning this case and they can't see what has happened to me during probate court because I never got a fair trial and if this is not misconduct or conflict of interest then what would you call this case? Here is what I cannot understand- the opposing attorney or the courts or my brothers or sisters don't have ANY LEGAL DOCUMENTS from my father stating their case. My father had a Last Will and Testament that he got an attorney to write up for him. It said NOWHERE in his Will that his son Dennis Moore would owe him or his estate one dime. Now, since our father has passed away and no one has legal documents from him, no one has promissory notes, and none of this is in his Will. How can the courts honestly charge his son for a crime that never happened and no one has legal documentation from Thomas G. Moore. I know for a fact that Phillip Moore Sr. doesn't have any legal documents from our father because he did not even speak to our father in over three years prior to him passing away. I know for a fact that Francine Lawhon doesn't have any legal documents because she had not spoken to our father in 8 years prior to him passing away. I know for a fact that Thomas Paul Moore doesn't have any legal documents because he only came around every once in a while to see our father and that was typically a visit so that he could get money from our father. That is the reason that I know for a fact that they don't have anything legal from our

father because all of them hadn't talked to our father in years. They had NO relationship with him. They would not even pick up the phone and call him on his birthday or Father's Day. He passes away and they want to tell the courts that I, who had the best relationship with our father of all the siblings, owes his estate money? If they had concerns about what my father did and who he gave money to, why didn't they question him about all this WHEN HE WAS LIVING and not take it the courts after he was gone? If Thomas Paul Moore and Francine Lawhon would take their own father and mother to court time after time when they were living, what do you think they would honestly do to me (the one who was closer to our parents) after they are gone. My father knew this law suit was coming because before he passed away he told me and Dr. Mark Lawhon, his grandson/my nephew, as well as other members of the family when he passed away that he wouldn't be in the grave 6 months before one of those three would file a lawsuit against me, Dennis Moore. As opposed to what my father said, they didn't even wait six months. They filed a lawsuit within 45 days of him passing away. All three of them knew how close our relationship was (along with everyone else in the city of Florence) because we did everything together. This is why I said this case should have been thrown out from the beginning because of misconduct and conflict of interest. No one has anything from my father stating their case. Once again, if anyone has anything from our father himself stating that his son Dennis Moore owes the estate or himself money, please come forward and show it to the courts and me. I did say a LEGAL document (not fake copies of items you all have created and made up). You do not have promissory notes or anything in writing stating your case and it is clearly not in his Will. Now, how can you charge Dennis Moore for something when our father is not here to tell his side, or the truth, to the courts?

The courts need to ask my brothers and sisters how many times did they take our father to the doctor's office? How many nights did they stay at the hospital with him when he was sick? How many times did they pick him up out of his wheelchair? How many times did they wash or bathe him? How many times did they move his furniture around in his house so that he could sit comfortably when he was sick? How many times did they pick up his medicine for him? How many times did they really do ANYTHING for our father, period? The nurses and doctors at the hospital thought that I was an only child because I was the ONLY one there through all of this. Please, call some of these doctors' offices and find out who was there. Call anyone in Florence that knows our family and ask them who our father was always with. My brothers and sisters did nothing for our father the last few years of his life. Many of nights our father cried just hoping they could call him or come by~ they never did!

I have never in my life heard tell of anyone that was a personal representative of an estate have to pay money back to an estate. If that were the case, why appoint them as personal representative? All personal representatives I know are those that a family member TRUSTS to carry out a Will they way they

have it written and planned. Notice that no other brothers or sisters were appointed that role. Not to mention that with all of this, the Will itself has been completely ignored. This case has been nothing but accusations between my brother and sisters that have been around my entire lifetime. There was nothing in my father's Will or no legal documents in his Will that said I owe him or his estate any money. The judge was trying to make me pay back something that did not involve me. He was trying to make me pay back more money than there ever was in the estate itself.

What really gets me is that none of the claims against me are or were even true. If anyone in Florence knows me or my father, they know that, and I am sure they will all tell you. Ask anyone that knew of our relationship. If any of these claims against me were true, then why would Mr. Campbell win \$699,388 for his client, Thomas Paul Moore, but then call to settle for \$100,000 (my part)? That right there speaks for itself. That should send up a warning signal that something **is not right** here, and I do hope that is clear to you all too. This is part of the reason that I believe that I, the personal representative of this estate, was ambushed from the very beginning. I hope you consider each of these things as you move forward with a decision to close this estate out. I pray daily that I can get this stress and worry behind me and move on with my life.

Thank you,  
Dennis Moore

*Dennis Moore*

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Apr 29 2021

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attention to: Shelley Spenser date: 4-26-21 **SC Court of Appeals**

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