

11-5-2021

The South Carolina Court of Appeals

In the Matter of the Estate of Thomas G. Moore:

Michael Dennis Moore, Appellant,

v.

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

Appellate Case No. 2018-001144

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

RECEIVED

NOV 09 2021

SC Court of Appeals

Dear Ms. Kitchings:

Please file the original with the Court and file-stamp the copy for us and return same in the enclosed, prepaid, self-addressed envelope.

Thank you for your assistance in this matter.

Sincerely,

Heir - Phillip F. Moore Jr.
Alternate Personal Representative

Please give these documents to the Judges, we would like to ask why we are being treated this way, denying 3 of the Heirs to be involved in this appeal. I will NOT contact the S.C. Court of Appeals again until a decision is made. As a Heir and alternate Personal Representative of my Parents Estate I am entitled to an explanation. After the Briefs of 3 Heirs were stricken (by Pierce Campbell and Thomas P. Moore) and we were promised to have a Oral Argument, Why is the Court now stating 11-1-2021 - THIS CASE WILL BE SUBMITTED ON THE RECORD ON APPEAL AND BRIEFS during the November 2021 term WITHOUT ORAL ARGUMENT, stating this is Totally UN-FAIR AFTER our Briefs were stricken.

Heir - Phillip F. Moore Jr.
- 1504 Pemon Drive
Florence, S.C. 29505

11-5-2021

The South Carolina Court of Appeals

In the Matter of the Estate of Thomas G. Moore:

Michael Dennis Moore, Appellant,

v.

Thomas Paul Moore, Francine Laura Lawton Kaye Moore, and Phillip Frederick Moore, Respondents.

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NOV 09 2021

SC Court of Appeals

Appellate Case No. 2018-001144

TO: South Carolina Court Appeals Judges,

Why is the South Carolina Court of Appeals taken the rights away from 3 of the 5 Heirs - Phillip Frederick Moore (Alternate Personal Representative) Francine Laura Lawton and Linda Kaye Moore (Deceased), being denied to be involved in their Parents Estate. Phillip Moore (Alternate P. R.) has looked on the computer (S.C. Courts.ORG) everyday, keeping informed what is happening in the Estate of Thomas G. Moore.

For several months the 3 Heirs has been waiting for the South Carolina Court of Appeals to set a date for Oral Argument.

Below is a letter from the South Carolina Court of Appeals June 9, 2021.

Dear Counsel:

The above case appeared on an earlier preliminary list, but was not scheduled for argument. This case may or may not be considered during September 2021 or October 2021. If an argument is held, it may be held on September 13, 14, 15, 16, 22, or October 11, 12, 13, or 14. In the event your case is selected for oral argument, we ask you to advise the court of the specific nature of any conflict you may have on any of these dates by June 18, 2021.

Please send any conflicts you may have to Chief Deputy Clerk, V. Claire Allen to ctappfilings@sccourts.org.

Very truly yours,

Catherine Jamieson, deputy

CLERK

After reviewing the Letter June 9, 2021, Below was stated on the computer 7-9-2021.

7-9-2021 - Correspondence - Outgoing (Conflict Letter)

Dear Counsel:

The above case appeared on an earlier preliminary list, but was not scheduled for argument. This case may or may not be considered during November 2021. If an argument is held, it may be held on November 1, 2, 3, 4, 9 or 10. In the event your case is selected for oral argument, we ask you to advise the Court of the specific nature of any conflict you may have on any of these dates by July 19, 2021. Please send any conflicts you may have to Chief Deputy Clerk, V. Claire Allen to CTAppFilings@SCCOURTS.ORG. and Not by reply email.

Very truly yours,

V. Claire Allen

Clerk

After seeing this on the computer 7-9-2021, we were very excited that our Parents 7 1/2 year Probate could soon be over. This Probate being opened for 7 1/2 years as alternate Personal Representative has taken a toll on me emotionally and mentally at the age of 66 trying to close my Parents Probate by the Will itself and their wishes stated in the Will.

We were totally upset and devastated what was stated on the computer 11-1-2021.

Classification APPEAL - Common Pleas - Appeal from Probate Court
Case Status - Decision Pending

11-1-2021 Correspondence = Outgoing (Notice of Submission)

RE: In the Matter of the Estate of: Thomas G. Moore
Appellate Case No. 2018-001144

Dear Mr. Moore, Ms. Lawton and Counsel:

After careful consideration by the Court, this case will be submitted on the record on appeal and Briefs during the November 2021 term without ORAL Argument.

Very truly yours,
Jenny Abbott Kitchings
Clerk

We believed and Trusted the South Carolina Court of Appeals (A Higher Court) for several months to set a date for an Oral Argument. In our opinion, we took this statement as a promise that we will receive a date for a Oral Argument. Now, what is stated on the computer 11-1-2021 we believe the promise has been broken, Totally UN-FAIR.

Please read the letters (Enclosed) due to the fact that ALL the Briefs of the 3 Heirs = Phillip Frederick Moore (Alternate Personal Representative), Francine Laura Lawton and Linda Kaye Moore were Stricken and will Not be considered on the docket. As citizens of South Carolina we believed we would be treated Fair and would get Justice through our Court system concerning our Parents Probate. That has Not happened, Totally UN-Fair and a Disgrace. Read Letters Enclosed.

Due to the 11-1-2021 Correspondence, Why is the S.C. Court of Appeals taken the rights of 3 of the 5 Heirs to Close their Parents Probate by the Will and their wishes. All the Briefs submitted by Phillip Frederick Moore, Francine Laura Lawton and Linda Kay Moore (deceased) Under OATH were taken from the Transcript of the 1st Hearing we had Dec 22, 2015. The Truth was told in these Briefs submitted to the S.C. Court of Appeals and All the Briefs from Phillip F. Moore (alternate P.R) Francine L. Lawton, and Linda K. Moore (deceased) are going to be stricken. Now, 11-1-2021 the Court is going to make their decision on Briefs. The fact is without a doubt, we know who wanted our Briefs stricken - Pierce Campbell and Thomas Moore.

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

May 22, 2019

Mr. James Ross Snell, Jr., Esquire
123 Harmon Street
Lexington SC 29072

Ms. Vicki D Koutsogiannis, Esquire
123 Harmon Street
Lexington SC 29072

Re: In the Matter of the Estate of: Thomas G. Moore
Appellate Case No. 2018-001144

Dear Counsel:

We received your motion for extension of time to serve and file the respondent's final brief as well as the respondent's final brief of Phillip Frederick Moore. As per this Court's order dated April 10, 2019, the respondent's initial brief of Phillip Frederick Moore was stricken by this Court, and will not be considered on the docket. Therefore, this Court declines to accept the respondent's final brief of Phillip Frederick Moore. Please contact this Court within ten (10) days from the date of this letter if you wish to make arrangements to retrieve the original and bound copies of the respondent's final brief of Phillip Frederick Moore. This Court will dispose of the original and bound copies of the respondent's final brief of Phillip Frederick Moore if no arrangements are made within ten (10) days from the date of this letter.

Phillip Frederick Moore (Accomate P.R) retained James Snell and Vicki Koutsogiannis to represent him with the appeal in Columbia S.C. or submitted ALL the documents to Mr. Snell & I have NO idea why the Briefs that Mr. Snell and Vicki Koutsogiannis submitted to the S.C. Court of Appeals were stricken. What did Mr. Snell and Vicki Koutsogiannis do wrong?

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

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January 10, 2020

Phillip Frederick Moore
1504 Damon Drive
Florence SC 29505

Re: In the Matter of the Estate of: Thomas G. Moore
Appellate Case No. 2018-001144

Dear Mr. Moore:

We received your pro se respondent's final brief dated September 24, 2019, along with your correspondence dated September 24, 2019. Our records reflect that James Ross Snell, Jr., and Vicki D. Koutsogiannis, Esquire, are your counsel of record. No motion to relieve counsel has been made either by the attorneys or by you.

Also, by order dated April 10, 2019, the Court granted motion to strike the respondents' briefs of Phillip Frederick Moore, Linda Kaye Moore, and Francine Laura Lawhon Pro-Se.

The respondent's pro se brief and correspondence dated September 5, 2019 and September 24, 2019 are being returned to you.

By Law the Court could have stricken the Briefs of Phillip Moore due to the fact he was represented by attorneys that did something wrong by the Rules and Regulations of the Court.
I DO NOT believe the Court had a right to strike the Briefs of Pro-SE Hairs - Linda KAYE MOORE (Deceased) and Francine Laura Lawhon having NO ATTORNEY. They had NO ATTORNEY to make these briefs due to the Rules and Regulations of the Court. It was Totally Wrong for the Court to strike their Briefs. Pierce Campbell and Thomas P. Moore has succeeded in their actions to have all these Briefs stricken.

↓ ↓ ↓
C. Pierce Campbell

REPLY TO: Florence Office

E-Mail: PCampbell@TurnerPadget.com
Writer's Direct Dial: (843) 656-4429
Direct Fax: (843) 413-5837

↓ ↓ ↓
August 1, 2014

↓ ↓ ↓
Mr. Thomas P. Moore
226 White Palm Court
Florence, SC 29506

Re: Estate of Thomas G. Moore

Dear Mr. Moore:

↓ ↓ ↓ ↓ ↓ ↓
Thank you for selecting us to provide you with legal services. We welcome you and confirm your engagement of Turner Padget Graham & Laney in accordance with the terms of this letter. We are grateful for the opportunity to serve you and shall strive to provide you with effective and efficient legal services. Ultimately, your satisfaction with our services is the key to a successful professional relationship. This should begin with a mutual understanding of expectations regarding services to be performed and requires full and candid communications between us. Please let us know if you have any questions regarding any aspect of the matters the firm is handling for you.

The Probate Opened. Our Parents Will was submitted and Filed Feb. 2014.
The (Personal Representative) Michael Dennis Moore retained a attorney (Himself) to be represented in the Probate. The (Alternate Personal Representative) Phillip Frederick Moore retained a attorney to represent the Remaining 4 Heirs - Phillip Moore, Thomas P. Moore, Francine L. Lowman and Linda Kaye Moore.
The Four Heirs were satisfied with the attorney Phillip Moore retained.
Six months into the Probate the Heirs were Totally Shocked and did NOT understand why Thomas P. Moore retained his OWN Personal Attorney (Pierce Campbell) above Aug. 1, 2014.
It wasn't until the 1st Hearing we had Dec. 22, 2015 when we knew what Thomas P. Moore's intentions were to receive ALL the Interest our Parents Owned in the Richland County Property in Columbia, S.C. for (Himself) by Ambushing the Heirs with a Illegal, Un-dated, Unsigned Letter without our parents signature the Day of the Hearing. We believed this Letter was illegal and would NEVER be attached to our Parents Will. Thomas Moore typed this Letter himself.

① 4 of the 5 children of our Parents are devastated and shocked that Judge Scott or any other Judge would allow to attach this Undated, Unsigned, Illegal Letter without our Parents signature to a Will. This Letter is NOT Legal. We have retrieved several copies of letters that were typed and signed by our Parents from their files they kept after T.G. Moore passed away. This letter is Totally Different. There's no doubt in our minds Thomas Moore or someone else typed this letter.

NO DATE

Thomas G. Moore and Lester P. Moore purchased five acres of land in Horrell Hill, SC out from Columbia, SC off of Highway 76. The land was deeded in Thomas G. Moore and Lester P. Moore's name at the Columbia Court House. It was purchased for the purpose of building a new church on it.

Thomas G. Moore has three plaques that were awarded to him from Horrell Hill Baptist Church for his support and donations and tithing in building of the church, plus his twenty-five years of attending and supporting the church. He has continued paying his tithes up to the writing of his LAST WILL AND TESTATMNT ON FEBRUARY 6, 1998.

If this church in Horrell Hill, SC is ever RENTED OR SOLD, Thomas G. Moore bequeaths his half INTEREST OR OWNERSHIP to go to Thomas P. Moore. I have paid one half of the land and church building on this land.

My oldest son, Thomas Paul Moore, is a licensed minister ad if he decided to or was asked to run or help pastor the church, AFTER Lester P. Moore has DECEASED, I (Thomas G. Moore) would bequeath my one-half interest to go to Thomas P. Moore (My oldest son). If he does not want to pastor at the church, I would bequeath my one-half interest or ownership in the church and land to my son Thomas P. Moore, if the church is ever rented of sold. NO SIGNATURE

Our Parents would NEVER give anyone a Letter without their signature. all the letters we retrieved (Enclosed) from their files had their signature. Please compare letter (Enclosed)

- (1) Enclosed is the Letter - Pierce Campbell and Thomas Moore submitted the day in Court Dec. 22, 2015.
- (2) The remaining 4 Hairs NEVER SEEN this Letter until the day of the Hearing Dec. 22, 2015.
- (3) Two years had past before the Dec. 22, 2015 Hearing. Pierce Campbell and Thomas Moore NEVER disclosed, NEVER mentioned, the letter in the 2 years and did not disclose the letter at the Deposition Oct. 2, 2015 Phillip F. Moore paid for this Deposition before the Dec. 22, 2015 Hearing.
- (4) From the Beginning of the Richland County Property case until the end Pierce Campbell and Thomas Moore stated this letter was with the Will - until at the closing of the Issue - Thomas Moore stated on page 162 and 164 "Pennis Moore took it Out". After Thomas Moore testified that statement; Then read page 163 Pierce Campbell then stated to Judge Scott the letter was a COPY that they submitted.
- (5) Thomas Moore testified on page 163 that this letter was given to him in Early 2000.
- (6) The statement in Judge Scott's Order states "Examine the WRITINGS and Evidenced By The Writings". The remaining 4 Hairs submitted copies (Enclosed) to lower Court to match Thomas Moore's Early 2000 letter with the Early 2000 letters found in T.G. Moore's files after he passed away. This letter Thomas P. Moore submitted is Totally Different than the Original Letters made by T.G. Moore. Every letter we seen in T.G. Moore's files were SIGNED.

let → Original Letter from our Parents file they kept.
This letter was typed by our Parent and signed
by our father T.G. Moore. Totally different from Thomas's letter.

T.G. Moore's Cars Inc.

3308 E. Palmetto Street

Florence, SC 29506

(843) 669-6866 Office (843) 669-3237 Fax

"Over 50 years in business!"

↓ ↓ ↓ ↓
Dec. 2002

**Miriam McIver
Accounting Services**

Dear Miriam,

You will find enclosed a copy of T.G. Moore's Cars, Inc. employees that has worked for my company in 2002; names, addresses, and social security numbers.

Also, you will find names, addresses, and social security numbers of people that have done work for T.G. Moore's Cars, Inc. in the year of 2002 that I had to give a 1099 form to.

Also, you will find people that have done work for T.G. Moore's Cars, Inc., did not make enough money to get a 1099 form. Furnishing you their names and addresses. Some of these people have moved out of State. Some of them have gone out of business. Cannot locate one or two of them.

T.G. Moore's Cars, Inc. is being dissolved with the Secretary of State as of January 1, 2003. T.G. is closing my business after 50 years in the business. I will not need no accountant after Dec. 31, 2002. I appreciate working with your accounting services. Miriam, we get our statement around the 10th of January. I will bring you. Figure our year end taxes and dividends, if any, for T.G. Moore's Cars, Inc.

My son, Dennis Moore, says that he is going to open up a car business, January 2003. I told him, if he did, I would recommend him using the Miriam McIver Accounting Services. If he opens up his new business, he will be up there to talk to you about it.

T.G. Moore, P.A.



2nd → Original Letter from our Parents file they kept.
This letter was typed by our Parent and signed by
our father T.G. Moore. Totally different from Thomas's Letter.

Miriam McIver Accounting Services:

Miriam, when we get Moores Cars LLC bank statement for the month of January 2003, you will find T.G. Moore's Cars, Inc. bank statement for the month of January 2003. You will have to use both of these bank statements for Moores Cars L.L.C. accounting.

The purpose of using both bank statements is that we had to use T.G. Moore's Cars Federal I.D. number and State I.D. number to make our pay-roll tax deposits each week until the Crawford Law Firm give Moores Cars L.L.C. their Federal I.D. number. We have all of that straight now. The Federal gave Moores Cars, L.L.C. the same Federal I.D. number that T.G. Moores Cars had..

Dennis M. MOores wants you to do his accounting for Moores Cars L.L.C. like you did for T.G. Moores Cars.

T.G. Moore, P.A.
[Handwritten signature]

- II. Did the lower courts err in ruling that a contract to sell real property extinguished the rights of survivorship of the Appellant, the joint tenant with rights of survivorship, when the Testator, the deceased joint tenant died after the signing of a contract to sell real property, but before the closing and recording of the transfer of Deed?

4 of the 5 Heirs will agree with Judge Scott's Order on this issue, due to the facts and findings in the Dec. 22, 2015 Hearing.

- III. Did the circuit court err in ruling that the Appellant did not preserve the issue for review of prejudicial submission of evidence and allowance of additional claims the day of trial, when counsel for the Appellant did not object to evidence and claims at time of submission but later requested the ability to respond to Respondents allegations and submission of evidence; but was denied the opportunity by the Probate Court?

4 of the 5 Heirs will agree with Judge Scott's Order on this issue, due to the facts and findings in the Dec. 22, 2015 Hearing.

Please Return this Issue back to the 5 Heirs, as the Will states.

- I. Did the lower courts err in applying the doctrine of integration; where alleged integrated document was a separate envelope containing a document with instructions devising a piece of the Testator's estate and no evidence or testimony from attesting witnesses spoke as to the validity of the document or the presence of the document at the time of the signing of the will?

This issue should NOT have been presented to Judge Scott for his decision. All 5 Heirs made a promise and agreement together at the meeting 7 days after T. G. Moore's funeral. Now the Rickland County Property will be settled, Thomas Moore has changed his mind on the agreement ALL 5 Heirs made and broke his promise. This agreement was made before the Estate opened. 4 of the 5 Heirs will ask that the issue on the Rickland County Property be returned and settled by their agreement they made before the Probate opened, also, due to the fact with the illegal, unsigned letter Thomas submitted.

STATEMENT OF THE ISSUES ON APPEAL

- I. ^a Did the lower courts correctly rule that a letter was a part of the Decedent's will pursuant to the legal doctrine of integration, where there was testimony locating the letter and the will together in the safe and no evidence contradicting the requirements for integration was admitted?

- ① 4 of the 5 Heirs will testify under oath they NEVER seen the letter at the meeting 7 days after the funeral of T.G. Moore when ALL 5 children read the Will itself. It is proven in the Transcript from the testimony in the Dec 22, 2015 Hearing from ALL the Heirs including Pierce Campbell's client Thomas P. Moore, the letter was Not with the Will and the letter was NEVER seen at the meeting. Please Read Transcript.
- 4 of the 5 children states the Legal Doctrine of Integration should have NEVER been mentioned in the Probate.
- ② Thomas P. Moore and Pierce Campbell waited 2 years into this Probate to submit this letter the Day of the Hearing Dec. 22, 2015. The Transcript will prove Thomas P. Moore and Pierce Campbell has Lied through-out the Hearing to Judge Scott about this letter being with the Will and this letter and the Will was found together inside the safe. The false statements Pierce Campbell and Thomas P. Moore made did in fact mis-lead Judge Scott and greatly influenced Judge Scott in his Order. Please Read Transcript.
- ③ Please read the testimony given Under OATH by Pennis Moore earlier in the transcript on Page 65. Pennis Moore brought the Will to the meeting 7 days AFTER our fathers funeral. The Fact is Thomas P. Moore, Pierce Campbell, Judge Scott, or the remaining 4 Heirs Cannot testify anything about the Will - NO ONE was there when the Will was found by Pennis Moore. How can Pierce Campbell, Thomas P. Moore and stated in Judge Scott's Order → the letter and the Will together in the safe. → They WERE NOT THERE. Please Read Transcript.
- ④ The ONLY Issue that 4 of the 5 Heirs are Totally against in the Appeal is the Appeal above concerning the Richmond County Property. If our Parents wanted Thomas Moore to have the Interest in the

(1) The fact is it is proven in the transcript of the Dec. 22, 2015 Hearing. Pierce Campbell and Thomas Moore lied and made false statements about the letter. The truth is the Briefs submitted to the South Carolina Court of Appeals by Phillip F. Moore, Francine Lawler and Linda Moore stated the true facts about this letter from the testimony in the Dec. 22, 2015 Hearing. It was these briefs that urged Pierce Campbell to make a Motion to the S.C. Court of Appeals to have the Briefs Reconsidered. We would like to ask that the briefs of True Facts submitted to the South Carolina Court of Appeals be put back on the docket to be reviewed by the Judges. Lies and speculations were told by Pierce Campbell for disquiet Thomas P. Moore to take the \$350,000.00 Richland County Property away from the other 4 Heirs, as attorney Kathy Ervine and David Smith stated in the Hearing - IF T.G. Moore wanted the Richland County Property to go to Thomas P. Moore, "HE WOULD HAVE STATED IT IN THE WILL". We would ask the S.C. Court of Appeals Judges - Please be Fair and Return ONLY the Richland County Property back to the 5 HEIRS.

(2) Enclosed is a letter Pierce Campbell and Thomas P. Moore submitted the day of the Dec. 22, 2015 Hearing. This letter did not have our parents signature or anyone elses signature. The remaining 4 Heirs will NEVER believe this letter is Legal and should NOT have been admitted through our Court system. Two years into the Probate Thomas P. Moore had this letter in his possession and Pierce Campbell ambushed the other 4 Heirs the day of the Dec. 22, 2015 Hearing with this letter. The testimony in the Dec. 22, 2015 Hearing will prove the letter never existed with or near the Will.

(3) Thomas Moore and Pierce Campbell has committed Perjury in the Dec. 22, 2015 Hearing. Their testimony has greatly affected Judge Scott in his Order concerning the Richland County Property. The lies were proven through-out the Dec. 22, 2015 Hearing stating the Undated, Unsigned letter was With The Will and The Will was found inside The Safe. Please read the testimony Earlier in the transcript of the Dec. 22, 2015 Hearing on Page 65 (Enclosed) Who Found The Will and Where The Will Was Found - NOT In The Safe.

(4) 4 of the 5 Heirs Pray and make our Pleas to the South Carolina Court Judges to Return the Richland County Property Back in Probate for all Five Heirs as the Will states.

The Heirs of Thomas G. Moore and Earline B. Moore would like to ask - Why have a Hearing in Court when the testimony and facts are over-looked and disregarded by the Presiding Judge? We would like an answer from Judge Scott - Why was the testimony of facts given under oath at the beginning of the hearing considered when he made his Order.

These Facts are stated and the testimony was given under oath at the beginning of the Dec. 22, 2015 Hearing. Please Read Transcript.

- 1st - It has been proven on page 30 and 31 a meeting was held 7 days after T.G. Moore's funeral (ONLY) with the 5 Heirs Present.
- 2nd - It has been proven on page 32, this meeting was Before the Estate was OPENED and NO Personal Representative had been appointed.
- 3rd - It has been proven on page 31, Dennis Moore went in the safe before the meeting.
- 4th - ON page 65 - Dennis Moore testifies:
 - (A) getting together to meet at the House.
 - (B) Dennis states he went into the safe before the meeting.
 - (C) Dennis states he went into the safe to find the Will.
 - (D) Dennis states he was not the one that found the Will.
 - (E) Dennis states his daughter found the Will.
 - (F) Dennis states the Will WAS NOT IN THE SAFE when his daughter found it. (Pierce Campbell and Thomas Moore stated different.)
 - (G) Dennis states his daughter found the Will - UNDER A BEDPOST.
 - (H) ON Page 162 - Thomas Moore states the Will was read to ALL 5 children together when Dennis Moore brought it to the meeting 7 days after T.G. Moore's funeral.
 - (I) The fact is the items Dennis Moore brought to the meeting was the Title to our fathers Mercedes, the money that was the (ONLY) item in the safe that ALL 5 children counted together, and lost was the (Will itself) with Nothing attached.
 - (J) Before taking the Will to Probate Court - ALL 5 children came into an agreement that we would grant our parents wishes by what is stated in the Will - Equal to ALL 5 children named in the Will.
 - (K) after the meeting 7 days after T.G. Moore passed away, 2 years have passed into this Probate and the Dec. 22, 2015 Hearing. During this time Thomas Moore and Dennis Moore has broken their promise and the agreement ALL 5 children made together at the meeting before the Estate was opened.

5th We would like answers from Judge Scott, Pierce Campbell and Thomas Moore, why they made false statements through-out the Dec. 22, 2015 Hearing.

- (A) They have stated several times the letter was with the Will in the Safe first - the Will was not in the Safe - it was under a Bedpost.
- (B) Second - Dennis Moore brought the Will to the meeting - The FACT is Judge Scott, Pierce Campbell, Thomas Moore, Phillip Moore, Francine Lawton, Linda Moore or anyone else cannot say anything about the Will - None of the names mentioned above WAS PRESENT when the Will was found and where the Will was found.
- (C) all the testimony and statements from Pierce Campbell and Thomas Moore about this letter and the Will is TOTALLY SPECULATION.
- (D) Thomas Moore has stated twice on page 162 and 164 that Dennis Moore took the letter out of the Will. Question - Did Thomas Moore see Dennis take the letter out - NO - He was Not present.
- (E) The 5 heirs seen the Will together for the 1st time when Dennis Moore brought the Will to the meeting. We will testify under oath that there was NO letter attached or near the Will.
- (F) Judge Scott, Pierce Campbell has made many statements about what is inside the Safe from Thomas P. Moore's testimony, Please read the testimony Earlier on page 53 by Thomas P. Moore, How can Thomas Moore testify to Judge Scott and Pierce Campbell what is in the safe when the last time he seen in the safe was 30 days before his mother passed away in 2010.
- (G) On page 58, Thomas Moore testified Earlier lines 11-20 exactly what all 5 heirs agreed to at the meeting 7 days after T. B. Moore's funeral.
* at the End of the Richland County Property Issue, Thomas Moore's testimony has totally changed on page 161 - lines 2-11.
- (H) The Doctrine of Integration -
- (1) The Doctrine of integration should NOT be applied in this Probate
- (2) Pierce Campbell has lied and made a false statement on page 161 - lines 15-17. It WAS NOT located with the Will - under the Bed-Post
It was NOT present at the time of execution of the Will. All 5 heirs will testify under oath the letter was NOT with the Will when the Will was 1st seen at the meeting. Even Pierce Campbell's client testifies this on page 162+164

Classification: Appeal - Common Pleas - Appeal from Probate Court
Case Status - Decision Pending

11-1-2021 - Correspondence - Outgoing (Notice of Submission)

RE: In the Matter of the Estate of: Thomas G. Moore
Appellate Case No. 2018-001144

Dear Mr. Moore, Ms Lawton and Counsel:

After careful consideration by the Court, this case will be submitted on the record on Appeal and Briefs during the November 2021 term without Oral Arguments.

S. C. Appeal Court Judges,

Due to the fact that the briefs of the 3 Heirs Phillip F. Moore, Francine L. Lawton and Linda K. Moore were stricken by the actions of Thomas P. Moore's attorney (Pierce Campbell) to take away ALL the Interest of the Rickland County Property from the remaining Heirs with the illegal, un-dated, un-signed letter We would ask you to Please Review these dates (below) on the computer Before making your Decision. Thank you.

1-14-2019

1-16-2019

3-20-2019

6-18-2019

7-18-2019

9-26-2019

1-22-2020

6-1-2020

9-24-2020

11-13-2020

1-4-2021

2-17-2021

All we ask is to Return the Issue with the Rickland County Property back to the 5 Heirs.

Please refer to the Will Itself of our Parents and their wishes be granted.

Thank you,
Phillip F. Moore Jr.
Attorney Personal Representative



771
PRESS FIRMLY

PRIORITY MAIL EXPRESS



U.S. POSTAGE PAID
FLORENCE, SC
PERMIT NO. 81
FLORENCE, SC
\$27.10
R2302E125349-18



PRIORITY MAIL EXPRESS



EI 034 479 444 US

CUSTOMER USE ONLY

FROM: PHILIP MOORE
PHILIP MOORE
1504 DANON DRIVE
FLORENCE, SC 29505

PAYMENT BY ACCOUNT (if applicable)

RECEIVED

NOV 09 2021

DELIVERY OPTIONS (Customer Use Only)

Signature Required (Add the number of copies of the signature required to the address label.)
 Restricted Delivery (Requires a signature and is available for registered mail only.)
 Insured (Maximum value of \$5,000. Additional charges apply.)
 Registered Mail (Requires a signature and is available for registered mail only.)
 Return Receipt (Requires a signature and is available for registered mail only.)
 Return Receipt for Merchandise (Requires a signature and is available for registered mail only.)
 Signature Confirmation (Requires a signature and is available for registered mail only.)
 Signature Confirmation with Restricted Delivery (Requires a signature and is available for registered mail only.)
 Signature Confirmation with Return Receipt for Merchandise (Requires a signature and is available for registered mail only.)
 Signature Confirmation with Restricted Delivery and Return Receipt for Merchandise (Requires a signature and is available for registered mail only.)

POSTAL SERVICE USE ONLY

PO ZIP Code	Labelled Delivery Date (MM/DD/YY)	Postage
01521	11/9/21	\$27.10
Date Accepted (MM/DD/YY)	Registered Delivery Date (MM/DD/YY)	Insurance Fee
11/6/21	11/9/21	\$0.00
Weight (lb/oz)	Insurance Protection Fee	Low Amount Insurance Fee
12.06	\$0.00	\$0.00
Special Handling Fee	Registered Mail Fee	Label Postage & Fees
\$0.00	\$0.00	\$27.10
Height (in)	Insurance Protection Fee	
10	\$0.00	

TO: PLEASE PRINT

HONORABLE JENNY MITCHELL
DEPUTY CLERK SC COURT OF APPEALS
12 ROSENAT E Street
Colum Biv, S.C.
29201

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Phillip F. Moore Jr.
1504 Pomeroy Drive
Florence, S.C. 29505

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SC Court of Appeals

Honorable Jeremy Abbott Kittingling
Deputy Clerk, S.C. Court of Appeals
1220 Senate Street
Columbia, S.C. 29201