

11-22-2021

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 Lawhon, 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 24 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,

Hein Phillip F. Moore
Alternate Personal Representative

TO: All the Deputy Clerks of the South Carolina Court of Appeals
Why was this stated on the Computer 11-9-2021?

11-9-2021 - Correspondence - Incoming Phillip F. Moore Pro-Se Correspondence
I am NOT Pro-SE. There is Nothing stated on any of the documents the S.C. Court of Appeals received 11-9-2021 that Phillip F. Moore sent these documents Pro-Se. These documents were signed Phillip Moore (Alternate Personal Representative) on Behalf of Linda K. Moore (Deceased) Linda K. Moore has been Pro-Se (without a attorney) since Day One of my Appeal. I, Phillip Moore made a Promise to Linda K. Moore Before she Passed Away that I would Help Her (As Pro-Se) with letters and Briefs to the S.C. Court of Appeals keeping her involved in her Parents Probate. That's exactly what I tried to do with the documents submitted 11-9-2021 on Behalf of Linda K. Moore (Deceased) I do understand that Pursuant to Miller v State, 388 S.C. 341, this Court CANNOT accept Pro-Se filing from a Represented Party. Linda K. Moore has NEVER been Represented by a attorney. The documents sent 11-9-2021 should have NEVER been stated NO ACTION.

11-22-21

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 Lawhorn, Linda
Kaye Moore, and Phillip Frederick Moore, Respondents.

Appellate Case No. 2018-001144

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TO: South Carolina Court Appeals Judges,

SC Court of Appeals

I, Phillip F. Moore (Alternate Personal Representative) has been a Represented Party by James R. Snell and Vicki P. Koulaogiannis the 1st day of this appeal. I submitted some documents 11-5-21 to the South Carolina Court of Appeals on Behalf of (Deceased) Pro-Se Her Linda K. Moore.

The S.C. Court of Appeals received these documents 11-9-2021. Why did the Deputy Clerk state this on the computer 11-9-2021?

ON 11-9-2021 - Incoming Phillip F. Moore's Pro-SE Correspondence

ON 11-17-2021 - Outgoing - NO Action on Letter.

I do understand the Rule Pursuant to Miller v. State 385 S.C. 347 this Court cannot accept Pro-Se filings from a Represented Party. I am not Pro-Se. These documents were submitted on Behalf of (Deceased) Pro-Se Her Linda K. Moore and Linda K. Moore has NEVER been a Represented Party. Phillip F. Moore (Alternate Personal Representative) as a Represented Party made a Promise and agreement to Linda K. Moore Before she passed away, that I will try to Help Her Being a Pro-Se Her submitting letters and Briefs to the S.C. Court of Appeals keeping her involved in her Parents Probate. I made a Promise and I do not want to break that Promise even if she has passed away. That's exactly what I tried to do with the documents submitted 11-9-21 from her files.

Phillip F. Moore (Alternate Personal Representative) did in fact have documents (Himself) 11-9-2021, ONLY concerning not having a Oral Argument. The rest of the documents were on Behalf of (Deceased) Pro-Se Heir Linda K. Moore. I will ask the Judges on Behalf of (Deceased) Pro-Se Heir Linda K. Moore to please review and consider Her Documents 11-9-2021 and Her Documents Enclosed from her files. These documents of (Deceased) Pro-Se Linda K. Moore came directly from the Dec. 22, 2015 Hearing and the 1st day of her involvement as Pro-Se in this Probate Feb. 2014. It is very heart-breaking Linda K. Moore passed away and received NOTHING from Her Parents Estate.

What has upset me as (Alternate Personal Representative) is Not having a Oral Argument and it is stated on the computer 11-1-2021. This case will be submitted on the Record on Appeal and Brief. This is exactly what Pierce Campbell wanted to happen After he made a Motion to dismiss the Brief James R. Snell submitted on Behalf of Phillip F. Moore (Alternate Personal Representative). I am devastated that Pierce Campbell was retained by Thomas P. Moore Eight Months After the Probate Opened in Florence, S.C. to destroy the True Facts and Findings in Phillip F. Moore's Brief submitted to the S.C. Court of Appeals by James R. Snell. James Snell received a check for \$15,000.00 Oct. 29, 2018 to represent Phillip F. Moore (Alternate Personal Representative) in this Appeal. The ONLY Issue James Snell did in this Appeal is submitted a Brief. Now, Pierce Campbell did in fact submit a Motion to Dismiss this Brief. Why did Pierce Campbell want this Brief Dismissed, because in this Brief it did state the Lies and False Accusations made by Pierce Campbell and Thomas P. Moore about this illegal, undated, unsigned letter the Day of the Dec. 22, 2015 Hearing. As far as I'm concerned James Snell has done NOTHING in this Appeal.

Since James Snell's Brief was Dismissed he should have did something for his Retainer fee and made a Motion or what ever you have to do to have a Oral Argument. I do not know what the decision will be from the Judges with the illegal, undated, unsigned letter Pierre Campbell submitted that Thomas P. Moore typed (Himself) to inherit all the interest of our Parents concerning the \$350,000.00 Rickland County Property for him and his family. Four of the Five Heirs pray that the S.C. Court Judges Returns the Rickland County Property Issue Back to the 5 Heirs granting our Parents Wishes and what is stated in their Will. The remaining four Heirs were totally surprised and ambushed with this illegal, un-dated, un-signed letter the Day of the Dec. 22, 2015 Hearing without our Parents signature.

Alternate Personal Representative
Heir - Phillip F. Moore Sr.

LINDA KAYE MOORE
FLORENCE, SC

Pro-Se Hair Linda K. Moore
Deceased - Feb. 27, 2019.

Linda Kaye Moore, 66, of Florence, SC, passed away on Wednesday, February 27, 2019 at McLeod Hospice House surrounded by her family.

Ms. Moore was born a daughter of the late Earline Broach Moore and Thomas G. Moore.

In addition to her parents, she is preceded in death by sister, Christine Matthews.

Ms. Moore is survived by her sons, Chad Owens (Tiffany), Brad Owens, and Justin Owens (Delina); four grandchildren; one great-grandchild; brothers, Thomas Paul Moore (Barbara), Phillip Moore, and Dennis Moore (Crystal); sister, Francine Lawhon; and six nieces and six nephews who loved and cared for her.

Funeral services will be held at 2:00 PM on Friday, March 1, 2019, at the Stoudenmire-Dowling Funeral Home Chapel. Burial will follow at Mount Hope Cemetery.

Family will receive friends from 6:00 PM – 8:00 PM on Thursday at the funeral home.

Memorials may be made to McLeod Hospice, P. O. Box 100551, Florence, SC 29502 or to the Alzheimer's Association, 140 Stoneridge Drive, Ste 210, Columbia, SC 29210

Please sign the tribute wall for the family at www.stoudenmiredowling.com.

REPLY TO:

Francine L. Lawhon
Linda K. Moore
3401 Chantz Ct.
Florence, SC 29501

↓ ↓ ↓
JAN. 9, 2019

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, Francine Laura Lawhon, Linda
Kay Moore, and Phillip Frederick Moore
Appellate Case No.: 2018-001144

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the following for filing in the above case:

1. Initial Brief of Respondents
2. Designation of Matter to be Included on the Record;
3. Certification
4. Certificate of Service.

Pro-SE Heir Linda K. Moore

↓ ↓ ↓
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JAN 14 2019

SC Court of Appeals

(Deceased) Feb. 27, 2019

Jan. 9, 2019

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Circuit Court

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

In the Matter of: Estate of Thomas G. Moore

Michael Dennis Moore..... **Appellant**



Linda Kaye Moore
(Deceased)
Feb. 27, 2019

Francine Laura Lawton



Respondents



INITIAL BRIEF OF RESPONDENTS

Pro = SE Hein → Linda Kaye Moore, Francine Laura Lawton

Deceased
Feb. 27, 2019

Francine L. Lawton
Linda Kaye Moore
3401 Chantz Ct.
Florence, SC 29501

Jan 9, 2019

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Circuit Court

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

In the Matter of Estate of Thomas G. Moore

Michael Dennis Moore, Appellant

Pro-SE Heirs
Linda Kaye Moore, Francine Laura Lawhon, Respondents
Received Feb. 27, 2019

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

RESPONDENTS CERTIFICATION

I, the undersigned Respondents, certify that the Designation of the Matter to be included in the Record on Appeal contains no matter which is irrelevant to the appeal.

Pro-SE HEIRS

(Received) Feb. 27, 2019 →

Francine L. Lawhon
Linda K. Moore
3401 Chantz Ct.
Florence, SC 29501

Jan 9, 2019

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM FLORENCE COUNTY
Circuit Court**

Thomas A. Russo, Circuit Court Judge

Appellate Case No.: 2018-001144

In the Matter of: Estate of Thomas G. Moore

Michael Dennis Moore, Appellant

Pro - SE Heir
Linda Kay Moore, Francine Laura Lawton, Respondents
(Received) Feb. 21, 2019

BRIEF OF RESPONDENTS

CERTIFICATE OF SERVICE

I certify that I have served the Initial Brief of Respondents Designation of Matter to be included in the Record on Appeal, Certification, and Certificate of Service on **JAN. 9, 2019** delivery to the Deputy Clerk, South Carolina Court of Appeals, 1220 Senate Street, Columbia, SC 29201 and by depositing a filed stamped copy of same in the United States Mail, postage prepaid, addressed to the following:

Norwood DuRant, Jr., Esquire
Law Offices of N. David DuRant
P.O. Box 14722
Surfside Beach, SC 29587
Attorney for Appellant

James R. Snell, Jr., Esquire
Vicki Koutsogiannis, Esquire
Law Office of James R. Snell, Jr., LLC
123 Hammon Street
Lexington, SC 29072
Attorney for Phillip Frederick Moore

TURNER PADGET

TURNER PADGET GRAHAM & LANEY PA.

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

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.

Eight Months after the Probate opened Feb. 2014 in Florence S.C.,
(Deceased) Pro-Se Heir Linda K. Moore NEVER KNEW why Thomas Moore
Retained his OWN PERSONAL ATTORNEY until the Pay of the
Dec. 22, 2015 Hearing.

(Deceased) Pro-Se Heir Linda K. Moore and the other 3 Heirs
was Totally Surprised when Pierce Campbell and Thomas P. Moore
submitted a illegal, un-signed, un-dated letter without our
Parents signature to Judge Scott the Pay of Her 1st Hearing 12-22-15.
Thomas P. Moore keeping this illegal, un-dated, un-signed letter
in his possession for 2 years, (Deceased) Pro-Se Heir Linda Moore
and the other 3 Heirs believed Thomas P. Moore typed this
letter Himself or someone else typed the Letter for Thomas.

Deceased Pro-Se Heir Linda H. Moore and the other 3 Heirs were devastated that Judge Scott or any other Judge would allow this illegit, un-dated, un-signed letter Below to be submitted through our Court System. Could it be the relationship between Judge Scott and Pierce Campbell both from the same Law Firm, Deceased Pro-Se Heir Linda Moore and the other 3 Heirs could not think of any other reason.

The statement in Judge Scott's Order states! Examine the Writings and Evidence by the Writings Compare this letter with Letters Enclosed

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 TESTAMNT 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 and 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 or sold.

NO Signature

After the Dec. 22, 2015 Hearing, the Statement in Judge Scott's
Order States: Examine the Writings and Evidence by the
Writings

1st original letter retrieved from our Parents File
after the Funeral.

Typed and signed by our Parents.

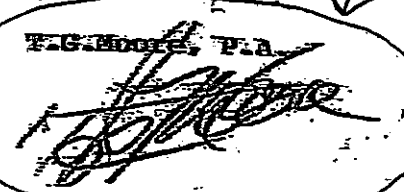
Please Examine and Compare with the Letter
Pierce Campbell and Thomas P. Moore submitted to the Court.

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.


2nd Letter retrieved from our Parents File.
after the Dec 22, 2015 Hearing, the Statement in Judge Scott's
Order States: Examine the Writings and Evidence by the
Writings.

2nd original letter retrieved from our Parents File
after the Funeral: Typed and signed by our Parents.
Please Examine and Compare with the Letter Priscilla Campbell
and Thomas P. Moore submitted to the Court.

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.
[Signature]

STATEMENT OF ISSUES ON APPEAL

- 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?

(Deceased) Pro-Se Heir Linda K. Moore and the other 3 Heirs will agree with Judge Scott's Order on this issue due to the facts and findings in the Dec. 27, 2015 Hearing submitted to Judge Scott

- 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?

(Deceased) Pro-Se Heir Linda K. Moore and the other 3 Heirs will agree with Judge Scott's Order on this issue due to the facts and findings in the Dec. 27, 2015 Hearing submitted to Judge Scott.

-
- 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?

(Deceased) Pro-Se Heir Linda K. Moore and the other 3 Heirs agree that 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 how the Richland County Property will be settled. Thomas P. Moore submitted a illegal, un-dated, un-signed letter to receive all the interest for (himself) in the Richland County Property. Thomas has broken the Agreement and his Promise. We ask that this issue be Return to ALL 5 Heirs as the Will states

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

RECEIVED

NOV 24 2001

SC Court of Appeals

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