

12-8-2021

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 Lawhorn, 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

DEC 09 2021

SC Court of Appeals

Dear Ms. Kitchings:

Please file the original with the Court on Behalf of Pro-De Heir Linda K. Moore (Deceased) and file stamp the copy and return same in the enclosed prepaid, self-addressed envelope to be stored in her files. These documents should Not be Reviewed as Pro-De Linda K. Moore being a Represented Party.

Thank you for your assistance in this matter.

Please state this on the Computer

Date Correspondence - Incoming Submission - (Deceased) Linda K. Moore
Pro-De Correspondence

If Correspondence - Outgoing (No action is stated on the Computer)

Please State

date Correspondence - Outgoing (NO action on Correspondence Pro-De Heir
Linda K. Moore (Deceased))

The Decision should be given from the Judges if these documents submitted on Behalf of Pro-De Heir Linda K. Moore (Deceased) will be reviewed. Again, Linda K. Moore has NEVER been a Represented Party.

12-8-2021

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.

RECEIVED

DEC 09 2021

Appellate Case No. 2018-001144

SC Court of Appeals

To: South Carolina Court Appeals Judges,

This appeal was scheduled for an Oral Argument. Now, on the Computer 11-1-2021 it is stated: This Case will be submitted on Record on Appeal and Briefs. Since the 1st day of this Appeal Heir Linda K. Moore (Deceased) has been Pro-De (without a attorney) until she passed away. Pro-De Heir Linda K. Moore (Deceased) has been involved in her Parents Probate since the Probate Opened Feb. 2, 2014. Now, due to the fact this case will be submitted on Record on Appeal and Briefs, on Behalf of Pro-De Heir Linda Moore Enclosed are documents retrieved from her files keeping her involved in her Parents Probate. Will her documents be dis-regarded because of her death? These documents Pro-De Heir Linda K. Moore (Deceased) kept in her files came directly from the Facts and Findings in the Dec. 22, 2015 Hearing. If Pro-De Heir Linda K. Moore was alive Today she would politely asked the Judges to at least review her documents before making a decision. Enclosed will be the Last and Final documents submitted from the Files kept by Pro-De Heir Linda K. Moore (Deceased).

LINDA KAYE MOORE
FLORENCE, SC

*Pro-Se Hair Linda K. Moore (Deceased)
NEVER been a Represented Party
since the 1st Day of the Appeal.*

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

(Peccard) Pro-SF

JAN. 9, 2019

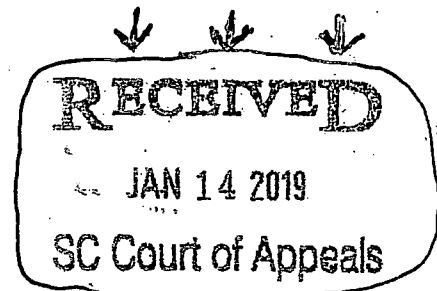
The Honorable Jenny Abbott Kitchings
Deputy Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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.



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, Francine Laura Lawton,.....Respondents
Pro-De-Heir
(Deceased)

INITIAL BRIEF OF RESPONDENTS

Linda Kaye Moore, Francine Laura Lawton
Pro-SEHEIR
(Deceased)

Francine L. Lawton

Linda Kaye Moore - *Pro-De-Heir (Deceased)*
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

Linda Kaye Moore, Francine Laura Lawhon, _____ Respondents
Pro-Se Heirs
(Deceased)

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

Pro-Se (Deceased)
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

Linda Kay Moore, Francis Laura Lawton, Respondents
Pro-De-Hair
(Deceased)

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 Hatton Street
Lexington, SC 29072
Attorney for Phillip Frederick Moore

Never being represented by a attorney in the Court of Appeals these are Documents submitted on Behalf of Pro-Se Heir Linda K. Moore (Deceased) retrieved from her Files.

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

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.

It has been proven on page 32, this meeting was Before the Estate was OPENED and NO Personal Representative had been appointed.

It has been proven on page 31, Dennis Moore went in the safe before the meeting.

ON page 65 - Dennis Moore testifies Under Oath:

- getting together to meet at the House after T.G. Moore's funeral.
- Dennis states he went into the safe before the meeting.
- Dennis states he went into the safe to find the Will.
- Dennis states he was not the one that found the Will.
- Dennis states his daughter found the Will.
- Dennis states the Will WAS NOT IN THE SAFE when his daughter found it. (Pierce Campbell and Thomas Moore stated different)
- Dennis states his daughter found the Will - UNDER A BEDPOST.

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. It time seen by the other 4 Heirs. 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 found under the Bed Post.

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. 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.

Paged

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

- 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.
 - 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.
- all the testimony and statements from Pierce Campbell and Thomas Moore about this letter and the Will is TOTALLY SPECULATION.
- 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.
- 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.
- 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.
- On page 58, Thomas Moore testified Earlier lines 11-20 exactly what all 5 Heirs agreed to at the meeting 7 days after T. P. Moore's funeral.
- * At the End of the Dickland County Property issue, Thomas Moore's testimony has totally changed on page 161 - lines 2-11.
- The Doctrine of Integration - The Illegal, un-dated, un-signed Letter.
- The Doctrine of Integration should NOT be applied in this Probate.
- 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 found by Dennis daughter.
- 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 lied testifies this on page 162 & 164.

Enclosed is the Letter - Pierce Campbell and Thomas Moore submitted the day in Court Dec. 22, 2015.

The remaining 4 Hairs NEVER SEEN this Letter until the day of the Hearing Dec. 22, 2015.

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. Philip F. Moore paid for this Deposition before the Dec. 22, 2015 Hearing.

From the Beginning of the Richmond County Property Issue 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.

Thomas Moore testified on page 163 that this letter was given to him in Early 2000.

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. Examine the Letter Thomas Moore and Pierce Campbell submitted Enclosed to the Original Letters Enclosed retrieved from T.G. Moore's files after he passed away.

Retrieved from the files of Pro-De Heir Linda K. Moore (Deceased)
How can Judge Scott or any other Judge allow this Illegal,
Undated, Un-signed letter (Below) be admitted through our Court System

The statement in Judge Scott's Order states: Examine
the Writings and Evidence by the Writings.

Compare this Letter with the Original Letters Enclosed.

Thomas G. Moore and Lester P. Moore purchased five acres of NO Date
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 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

Retrieved from the Files of Pro-Se Heir Linda K. Moore
(Deceased)

1st Original Letter retrieved from our Parents File
after T.G. Moore's funeral, typed and signed by our Parents.
after Dec. 22, 2015 Hearing, the Statement in Judge
Scott's Order States: Examine the Writings and Evidence
by the Writings.

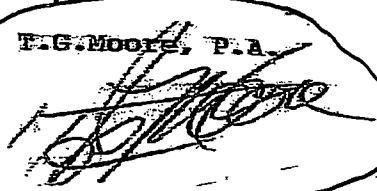
Examine and Compare with the Letter
Pierce Campbell and Thomas P. Moore submitted to
the Court Dec. 22, 2015 Hearing.

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.


retrieved from the files of Pro-Se Heir Linda K. Moore
(Deceased)

Second Original Letter retrieved from our Parents File
after T.G. Moore's funeral, typed and signed by our Parents.

Examine and Compare with the letter Pierre Campbell and Thomas 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]

Retrieved from the Files of Probate Linda H. Moore (Decedent)

STATEMENT OF THE ISSUES ON APPEAL

1. 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?

Letter submitted by 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. 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. Four of the Five Heirs will testify Under OATH they NEVER seen this letter at the meeting 7 days after the funeral of T. G. Moore when ALL 5 children together read the Will itself before the Will was submitted to Probate Court.

Attorney Kathy Elmore was Retained as the Lead Attorney to Represent the remaining 4 Heirs when the Probate Opened Feb. 2, 2014 in Florence, S.C.

Seven Months After the Probate Opened Heir Thomas P. Moore Retained his OWN Personal Attorney (Below) Aug. 1 2014. It wasn't until the 1st Hearing we had Dec. 22, 2015 when we realized why Thomas P. Moore Retained Pierce Campbell (Below) as his Personal Attorney. The Day of the 1st Hearing in this Probate Pierce Campbell submitted a Illegal, Un-dated, Un-signed Letter to Judge Scott on Behalf of Thomas P. Moore without our Parents Signature. Thomas P. Moore keeping this letter in his possession for 2 years, the Remaining Heirs believed Thomas typed this letter (Himself)

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.

