

# The South Carolina Court of Appeals

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

May 2, 2022

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**

MAY 03 2022

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed are documents concerning my attorneys James Snell and Vicki Koutsogiannis denying to represent me in this appeal and breaching their contract I was persuaded to sign by Mr. Snell Oct. 29, 2018. Before I signed the contract giving a \$15,000.00 check, Mr. Snell made a promise that I would receive full representation through-out the appeal (see contract) - He has broken his promise. The fact is and the evidence will show James Snell and Vicki Koutsogiannis representation completely STOPPED AFTER they submitted their 1st and ONLY initial final brief March 22, 2019. This initial final brief they submitted on behalf of Phillip Moore March 22, 2019 was dismissed and stricken from the record NOT to be reviewed on the docket by the Appeals Judges. Look on the computer S.C. Courts. Arg. date March 22, 2019. The brief was stricken by Motions submitted by Pierce Campbell - Her Thomas P. Moore's attorney. The fact is the ONLY reason Pierce Campbell filed Motions to strike the brief, the brief stated facts about the illegal, un-dated, not notarized, un-signed letter Pierce Campbell and Thomas Moore submitted in Probate Court Florence, S.C. The remaining heirs were ambushed with this letter the day of our 1st Hearing Dec. 22, 2015.

Mr. Snell and Vicki Koutsogiannis has refused to submit and file anything else to the Court on behalf of their client Phillip F. Moore. After the decision by the S.C. Appeals Judges Jan. 5, 2022, James Snell and Vicki Koutsogiannis has denied my phone calls and letters concerning my Request to file a Petition for a Writ of Certiorari. In my opinion they intend to wait until the 30 days expire to file the Petition. Due to the Mis-Representation and Conduct by James R. Snell and Vicki Koutsogiannis through-out this Appeal, they have shown inappropriate Behaviors officers of the Court. They have shown questional Judgement which demonstrates an unfitness to practice Law. All attorneys as officers of the Court give an oath to Protect the Public and the Integrity of the Legal System.

I am receiving letters from the Courts to consult my attorneys with a request to file a Petition for a writ of certiorari. What do I do when my attorney Refuses to talk to me?

The last call I made to the Snell Law Firm to request a Petition for a writ of certiorari to be filed before the 30 days expires Mr. Snell and Vicki Koutsogiannis would not speak to me. Their secretary gave me their message to let me know they did not represent me anymore.

I am totally confused. Enclosed is a copy of a letter from the South Carolina Court of Appeals denying their motion to be relieved. Today May 2, 2022 the South Carolina Court of Appeals and the Supreme Court of South Carolina has stated in their letters and on the computer that I am represented by James Snell and Vicki Koutsogiannis. Today May 2, 2022, James Snell and Vicki Koutsogiannis are refusing to file a Petition for a writ of certiorari and Breached their Contract.

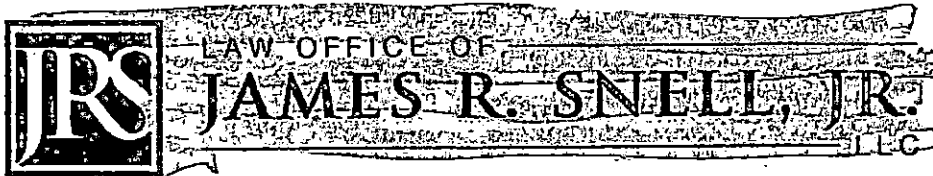
Phillip F. Moore  
Alternate Personal Page

# The Supreme Court of South Carolina

## DISCIPLINARY COUNSEL

Living in Florence, S.C. and 3 issues in our Parents Probate was appeal to the S.C. Court of Appeals in Columbia, S.C. I had no other choice except to retain a attorney to represent me in Columbia, S.C. I searched on the computer several days for a Appeals attorney that could handle this appeal in Columbia, S.C. I made an appointment Oct. 29, 2018 with the Law Office of James R. Snell Jr. LLC. I met James Snell Oct. 29, 2018 in his office to discuss this appeal and was searching for a attorney to represent me in this appeal. Mr. Snell stated his firm has represented several Appeals in the S.C. Court of Appeals and convinced me he could represent me in this appeal with proper representation. What Mr. Snell told me about his Law firm persuaded me to sign the Contract. Enclosed - I put my faith and trust in Mr. Snell by signing an agreement or contract Oct. 29, 2018, giving the Snell Law firm a check for \$15,000.00 and Mr. Snell agreed that day that I would receive full representation through-out the S.C. Court of Appeals.

Today, April 19, 2022 this Probate Appeal has affected me Emotionally and mentally, Retired at the age of 67. Due to the Mis-Representation and Conduct by James R. Snell through-out this Appeal, he has shown inappropriate Behavior as an officer of the Court. He has shown questionable Judgment which demonstrates an unfitness to practice Law. All attorneys as officers of the Court give an oath to protect the Public and the integrity of the legal system. Enclosed - James Snell and Vicki Koutsogiannis has Breached their Contract. After the ONLY brief they submitted March 20, 2019 was Stricken from the record Not to be considered by the Appeal Judges they did Nothing else through-out this Appeal for the Appeals Judges to Review. Now, after the Appeals Judges decision Jan. 5, 2022 they have refused my telephone calls and letters concerning my request to File a Petition for a Writ of Certiorari. I have received letters from the Courts to contact my attorneys in this case. What do I do if my attorneys will Not respond.



The undersigned hereby retains the Law Office of James R. Snell, Jr., LLC, for the following service:

Representation before the South Carolina Court of Appeals in the Estate of Thomas G. Moore

The Attorney's fee shall be a minimum flat fee of \$15,000. This amount is earned upon receipt. It includes all services before the Court of Appeals. In addition, the client is responsible for any costs which will include costs of printing and binding the brief and record on appeal, and any filing fees to the Court of Appeals.

This agreement does not provide for services upon remand back to the Probate Court. In the event of a remand the client will be responsible for retaining another attorney (or representing himself pro se) to assist in that court and shall consent to the attorney's withdrawal from the matter.

In addition this agreement does not provide for services in the event any side appeals to the South Carolina Supreme Court. In the event of a further appeal to the Supreme Court the client shall be responsible for payment of an agreed-upon amount of additional attorney's fees or shall consent to the attorney's withdrawal from the matter (or hiring another attorney or representing himself pro se).

Client acknowledges that appeals can take two years, or more, to be decided. Further that his case may involve novel and/or unusual applications of law or legal principals, and as such it is impossible to forecast or estimate the ultimate conclusion. There are no promises or guarantees made concerning the ultimate outcome of this case. The clients agree to keep the attorney informed of their mailing address and contact telephone number - these are the primary methods by which attorney communicates with client. Services may be provided by any attorney employed with or associated by the Law Office of James R. Snell, Jr., LLC. The fee being paid herein is not being held in a trust account. The client has a right to terminate the lawyer-client relationship and discharge the lawyer. In the event that the legal services are not provided the client may be entitled to a refund. Any other services or matters the Clients want to hire the attorney for will also require a new representation and fee agreement and payment of any required fees.

Phillip F. Moore, Jr.  
Phillip F. Moore, Jr. SR.

Date: October 29, 2018

I retained the Law Office of James R. Snell LLC Oct. 29, 2018 writing a check for \$15,000.00 the same day. James Snell and Vicki P. Koutsogiannis was retained to represent me in this appeal in the S.C. Court of Appeals. I left ALL the papers and documents concerning this appeal the same day when signing the contract. Together we did discuss all 3 issues in this appeal.

The 1st Issue Mr. Snell and Ms. Vicki did representing me in the appeal, they submitted a brief Enclosed March 20, 2019 on behalf of Phelby Frederick Moore.

Enclosed - I was totally devastated and upset when I received this letter May 22, 2019 (Enclosed). What did Mr. Snell and Ms. Vicki do wrong to have my brief stricken by the court and will NOT be considered on the docket. Please look on the computer S.C. Courts. Org. the Brief dated March 20, 2019 has been deleted and is Blank.

After the brief was stricken and Dismissed I had nothing through-out the entire appeal for the appeal Judges to review even when the Appeals Judges gave their decision Jan. 5, 2022. Today is April 19, 2022, Mr. Snell and Ms. Vicki has denied submitting anything else to represent me in this appeal since the brief was stricken and dismissed May 22, 2019. They will NOT Respond.

March 20, 2019

4

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:  
THOMAS G. MOORE (Decedent)

Michael Dennis Moore ..... Appellant,

v.

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

*Stricken & Premised - (Enclosed)*

INITIAL BRIEF OF RESPONDENT PHILLIP FREDERICK MOORE

James R. Snell, Jr.  
Law Office of James R. Snell, Jr., LLC  
123 Harmon Street  
Lexington, South Carolina 29072  
(803) 359-3301 | (800) 567-6249 (facsimile)  
Attorney for Respondent Phillip Frederick 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

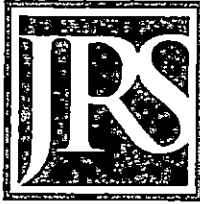
Dear Counsel:

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.

# The Supreme Court of South Carolina

I am totally upset and devastated with the representation and actions by my attorneys James Snell and Vicki Koutsogiannis near the end of this appeal, denying me to be involved in my parents Probate. What is their problem, I desperately need a attorney to represent me now than the 1st day they were retained.

- (1) Enclosed - James R. Snell submitted a letter to the South Carolina Court of Appeals dated Feb. 11, 2022 to file a Motion of Phillip's Moore to Relieve Counsel.
- (2) Enclosed - is a Letter (ORDER) from The South Carolina Court of Appeals filed and dated March 24, 2022 - The Motion to Relieve Counsel is Denied.
- (3) Today April 29, 2022, James R. Snell and Vicki Koutsogiannis are the attorneys paid to represent Phillip F. Moore. They should not take their anger and frustration towards their client due to the fact the Motion was Denied by the S.C. Court of Appeals. They are upset about something.



LAW OFFICE OF  
**JAMES R. SNELL, JR.**  
LLC

February 11, 2022

↓ ↓  
SC Court of Appeals

PO Box 11629

Columbia, South Carolina 29211

← received Feb. 14, 2022

**Re: In the Matter of the Estate of: Thomas G. Moore (Michael D. Moore) vs.  
Thomas P. Moore, Francine L. Lawhon, Linda K. Moore, & Phillip F.  
Moore  
Case No.: 2018-001144**

Dear Sir or Madam,

Please find enclosed The Motion of Phillip Moore to Relieve Counsel signed by the Respondent, Phillip Moore for filing. Also enclosed is a check in the amount of \$50.00 for the filing fee for the Motion to Relieve Counsel in the above-referenced case. We appreciate your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact our office.

Sincerely,

James Snell

Enclosure

cc: Phillip Moore  
1504 Damon Drive  
Florence, SC 29505

**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, Estate of  
Linda Kaye Moore, and Phillip Frederick Moore,  
Respondents.

Appellate Case No. 2018-001144

**ORDER**

Phillip Frederick Moore moves this court for an order relieving James Ross Snell, Jr., and Vicki D. Koutsogiannis as counsel of record for Respondent. Upon review, the motion is denied.

*Paul W. Thomas*

J.

*John D. Besten*

J.

*Thomas C. Hoff*

A.J.

Columbia, South Carolina

**FILED**  
**Mar 24 2022**

cc:



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF 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](http://www.sccourts.org)

January 05, 2022

Michael Dennis Moore  
2129 Kristens Channel  
Florence SC 29501

Mr. C. Pierce Campbell, Esquire  
PO Box 5478  
Florence SC 29502

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

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

Francine Laura Lawhon  
2005 Third Loop Rd.  
Florence SC 29501

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

Dear Mr. Moore, Ms. Lawhon and Counsel:

Enclosed is the decision of the Court. The remittitur will be sent as provided by Rule 221(b) of the South Carolina Appellate Court Rules.

Very truly yours, ..

*V. Claire Allen*

CLERK

cc: The Honorable Thomas A. Russo  
The Honorable J. Munford Scott, Jr.

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

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

Michael Dennis Moore, Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon, Estate of  
Linda Kaye Moore, and Phillip Frederick Moore,  
Respondents.

Appellate Case No. 2018-001144

---

Appeal From Florence County  
J. Munford Scott, Jr., Probate Court Judge  
Thomas A. Russo, Circuit Court Judge

---

Opinion No. 5887

Submitted November 1, 2021 – Filed January 5, 2022

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**AFFIRMED IN PART AND REVERSED IN PART**

---

Michael Dennis Moore, pro se.

C. Pierce Campbell, of Turner Padgett Graham & Laney,  
PA, of Florence, for Respondent Thomas Paul Moore.

James Ross Snell, Jr. and Vicki D Koutsogiannis, of Law  
Office of James R. Snell, Jr., LLC, both of Lexington, for  
Respondent Phillip Frederick Moore.

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**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**APPEAL FROM FLORENCE COUNTY  
J. Munford Scott, Jr., Probate Court Judge  
Thomas A. Russo, Circuit Court Judge**

**Appellate Case No: 2018-001144  
Opinion No.: 5887  
Submitted November 1, 2021-Filed January 5, 2022**

**IN THE MATTER OF:  
THOMAS G. MOORE (Decedent)**

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

v

**Thomas Paul Moore, Francine Laura Lawhon,  
Linda Kaye Moore, Phillip Frederick Moore ..... Respondents.**

**RESPONDENT PHILLIP FREDERICK MOORE'S  
PETITION FOR REHEARING**

**Respondent Phillip Frederick Moore, hereby submits this Petition for Rehearing asking that  
the Court reconsider its decision.**

- I. Joint Tenancy with a Right of Survivorship**
  
- III. Separate Envelope**



# The Supreme Court of South Carolina

PATRICIA A. HOWARD  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA  
29211

1231 GERVAIS STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-1499  
[www.sccourts.org](http://www.sccourts.org)

April 6, 2022

Mr. Phillip E. Moore, Esq. SA.  
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:

This responds to your letter to Chief Justice Beatty dated April 4, 2022.

If you desire to have this Court review the decision of the South Carolina Court of Appeals in the above case, you will need to timely serve and file a petition for a writ of certiorari under Rule 242 of the South Carolina Appellate Court Rules (SCACR).<sup>1</sup> As noted by footnote 2 of in this Rule, you do not need to provide an appendix. Further, as indicated by footnote 1 of this Rule, the filing fee for the petition is \$250.

Very truly yours,

CLERK

<sup>1</sup> The SCACR is available at [www.sccourts.org/courtreg](http://www.sccourts.org/courtreg).

Enclosure (Copy of Rule 242, SCACR)

cc: Mr. Michael Dennis Moore  
C. Pierce Campbell, Esquire

~~James Ross Snell, Jr., Esquire~~

~~Vicki D. Koutsogiannis, Esquire~~

Ms. Francine Laura Lawhon

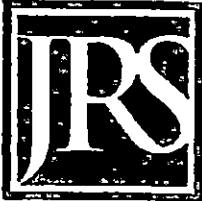
The Honorable Jenny Abbott Kitchings

*Why are my attorneys denying to  
contact their client to file a  
Petition for a writ of certiorari?*

# The Supreme Court of South Carolina

I am totally upset and devastated with the representation and actions by my attorneys James Snell and Vicki Koutsogiannis near the end of this appeal, denying me to be involved in my parents Probate. What is their problem, I desperately need a attorney to represent me now than the 1st day they were retained.

- (1) Enclosed - James R. Snell submitted a letter to the South Carolina Court of Appeals dated Feb 11, 2022 to file a Motion of Phillip Moore to Relieve Counsel.
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- (3) Today April 29, 2022, James R. Snell and Vicki Koutsogiannis are the attorneys paid to represent Phillip F. Moore. They should not take their anger and frustration towards their client due to the fact the Motion was Denied by the S.C. Court of Appeals. They are upset about something.



LAW OFFICE OF  
**JAMES R. SNELL, JR.**  
LLC

February 11, 2022

↓ ↓  
SC Court of Appeals ← received Feb. 14, 2022  
PO Box 11629  
Columbia, South Carolina 29211

**Re: In the Matter of the Estate of: Thomas G. Moore (Michael D. Moore) vs.  
Thomas P. Moore, Francine L. Lawhon, Linda K. Moore, & Phillip F.  
Moore  
Case No.: 2018-001144**

Dear Sir or Madam,

Please find enclosed The Motion of Phillip Moore to Relieve Counsel signed by the Respondent, Phillip Moore for filing. Also enclosed is a check in the amount of \$50.00 for the filing fee for the Motion to Relieve Counsel in the above-referenced case. We appreciate your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact our office.

Sincerely,

  
James Snell

Enclosure

cc: Phillip Moore  
1504 Damon Drive  
Florence, SC 29505

**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, Estate of  
Linda Kaye Moore, and Phillip Frederick Moore,  
Respondents.**

**Appellate Case No. 2018-001144**

**ORDER**

**Phillip Frederick Moore moves this court for an order relieving James Ross Snell, Jr., and Vicki D. Koutsogiannis as counsel of record for Respondent. Upon review, the motion is denied.**

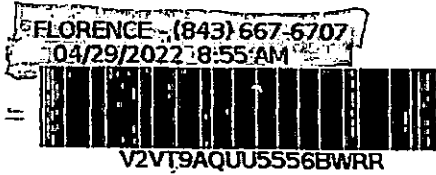
*Paul W. Thomas* J.  
*John O. Osteen* J.  
*Thomas C. Hoff* A.J.

**Columbia, South Carolina**

**FILED  
Mar 24 2022**

cc:

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OfficeMax**



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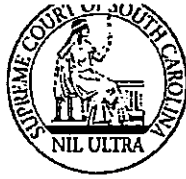
TO: Chief Justice Beatty and  
Patricia Howard - Clerk of Court

**COPY**

Enclosed are the letters I received April 26, 2022 from the Supreme Court of South Carolina.

Above is a copy of a receipt from Office Depot stating that I faxed these 3 papers to my attorneys James R. Snell and Vicki K. I have tried to contact Mr. Snell and Vicki K. several times to file a Petition for a writ of certiorari I have left messages several times for my attorneys to call me After the decision was given by the Appeals Judges Jan. 5, 2022 before the 30 days expires to file a petition for a writ of certiorari, they have NEVER responded to my letters or phone calls. What can I contact or what else can I do if my attorneys will Not respond with time running out. I am not a attorney and do not know what to do, that's exactly the reason I contacted Chief Justice Beatty for help to file a petition for a writ of certiorari. The fact is a attorney needs to file these papers. As officers of the Court giving a oath, my attorneys James R. Snell and Vicki Koutsogiannis's actions towards their client has severely affected me mentally and emotionally.

Hair - Phillip F. Moore Sr.  
alternate Personal Representative



4-29-22

Forward to  
James R. Snell  
Vicki Koutsogiannis

## The Supreme Court of South Carolina

PATRICIA A. HOWARD  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

# COPY

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-1499

TO: Mr. Phillip F. Moore

FROM: Patricia A. Howard, Clerk of Court *PAH*

DATE: April 26, 2022

This Court has received your recent correspondence to Chief Justice Beatty.

This Court has not received any petition for a writ of certiorari to review the decision of the South Carolina Court of Appeals in Appellate Case Number 2018-001144. I would encourage you to contact your attorneys in this case.

cc: Michael Dennis Moore  
C. Pierce Campbell, Esquire  
James Ross Snell, Jr., Esquire  
Vicki D Koutsogiannis, Esquire  
Francine Laura Lawhon

4-29-22

In my opinion there has been corruption and conspiracy with the separate letter issue and Pierce Campbell. I am forwarding this letter to Mr. Snell April 29, 2022. The fact is the ONLY issue you did in this appeal was submitting a Initial Final Brief March 22, 2019. You allowed Pierce Campbell to file a Motion to strike and dismiss this Initial Final Brief not to be considered on the docket, giving your client no explanation why you let this happen. I have been denied to be involved in this appeal for the Judges to review to give their decision AFTER the Initial Final Brief was struck from the record. I will ask one more time as my attorney to call me 843-601-3341 if you are going to submit a Petition for a Writ of Certiorari?

COPY

Page 2

4-29-22

If you refuse to submit a Petition for a Writ of Certiorari I will lose  $\frac{1}{5}$  (\$30,000) of my part in the Lower Richland County Property valued at \$350,000.00. The remaining 4 Heirs believes Thomas P. Moore typed this letter (himself) committing fraud to receive all our Parents interest in the Richland County Property \$350,000.00. Read the Transcript, it was proven in Probate Court Florence, S.C. this letter NEVER Existed. This letter was NEVER SEEN until the remaining Heirs were ambushed with this letter by Thomas P. Moore's attorney - Pierce Campbell the day of the Hearing. Judge Scott or any other Judge should Not have allowed this illegal, UN-dated, not notarized, Un-signed letter to be submitted through our Court system. I am retired and have all the time needed to submit documents and letters to all our govt. offices to receive Justice: and how I have been treated as alternate Personal Representative through-out my parents Probate. Mr. Duell if you do not call me with your decision after you receive this letter I will have the week-end to start my next steps to be treated fair and receive Justice in this Probate. I already looked on the computer and have the addresses.

Sincerely,  
Heir - Phillip F. Moore Sr.  
alternate Personal Rep.

P.S. - I have kept copies of documents and letters I received through-out this appeal.

**COPY**

Page 3

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.**

not notarized

NO Signature

Read Transcript - Pierce Campbell and Thomas P. Moore finally admitted at the end of the Richland County Property issue in Court Florence, S.C. that this letter they submitted was a COPY. Where is the Original? It wasn't attached or near the Will (Proven in Court). It wasn't with the important papers our parents kept in their files. No matter how long it takes I will seek Justice to grant my Parents wishes stated in their Will. Turn it around - What if it were your Parents.

