

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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**RECEIVED**  
JUN 16 2022  
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
COURT OF COMMON PLEAS

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LETITIA H. VERDIN, CIRCUIT COURT JUDGE  
Case No. 2019-CP-23-7116

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APPELLATE CASE NO. 2022-00011

---

JESSIE J. CARTER

APPELLANT

-V-

MARCO A, QUIROGA DBA  
OSCAR AUTO SALES, OSCAR  
QUIROGA DBA OSCAR AUTO  
SALES AND PALMETTO SURETY  
CORPORATION

RESPONDENTS

---

REPLY of RESPONDENTS OSCAR QUIROGO dba OSCAR AUTO SALES  
and MARCO A. QUIROGA dba OSCAR AUTO SALES

---

June 10, 2022

s/JAMES P. O'CONNELL #4259  
139 GRACE DRIVE  
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email: jpatrickoconnell@yahoo.com  
ATTORNEY FOR RESPONDENTS QUIROGA  
and OSCAR AUTO SALES

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## STATEMENT OF ISSUES ON APPEAL

1. Should the issue of dismissing Respondent Palmetto Surety from the case be ruled on after a trial on the merits?

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SALES AND PALMETTO SURETY  
CORPORATION

RESPONDENTS

IN the Matter of Appeal of Appellant as to Respondent  
Palmetto Surety Corporation

---

INITIAL BRIEF of Marco A. Quiroga dba Oscar Auto Sales and Oscar  
Quiroga dba Oscar Auto Sales

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STATEMENT OF THE CASE

Respondents Marco Quiroga dba Oscar Auto Sales and Oscar

Quiroga dba Oscar Auto Sales repeat the State of the Case as file with the Initial Brief of the Appellant.

### ARGUMENT

Respondents, here Replying, to the Initial Brief of the Appellant, are denying any and all allegations and inferences from those allegations, as to Respondents here replying; converting any funds and or any fraudulent representations by Respondents here replying, to Appellant, as that or those are issues for the trial court hearing: Reference to paragraph One line 11 page 2.; paragraph Two line three; paragraph One line 2., page 3; paragraph Two line 1 through 6.,

Respondents, here Replying, to the Initial Brief of the Appellant, as to the issues presented as to Respondent Palmetto Surety Corporation, that the Respondents Replying here, did pay for and understood the contract agreement with Respondent Palmetto Surety Corporation, did include the Respondent Palmetto Surety Corporation paying any and all claims as to the business of selling vehicles, which was an issue for the trail court hearing.

### CONCLUSION

Respondents here Replying request the Order of the Circuit Court be reversed.

June 10, 2022

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SALES AND PALMETTO SURETY  
CORPORATION

RESPONDENTS

---

CERTIFICATE

---

I CERTIFY that on June 10, 2022, I served the Respondents Marco Quiroga dba Oscar Auto Sales and Oscar Quiroga dba Oscar Auto Sales Reply on the Appellant and Respondent Palmetto Surety Corporation, by AIS email only addressed to counsel of record, and if an others, and by other means, as indicated below:

Barrett Ray Brewer  
Brewer Law Firm, LLC  
Post Office Box 1847  
Mt. Pleasant, SC 29465-1847  
by email: [barrett@brewerlawfirm.com](mailto:barrett@brewerlawfirm.com)  
Attorney for Respondent Palmetto Surety Corporation

Mathew J. Kappel  
114 Whitsett Street  
Greenville SC 29601  
by email: [kappellaw.com](mailto:kappellaw.com)  
Attorney for Appellant

and to;  
Jenny Abbott Kitchings  
Clerk of the Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Submitted respectfully by:

June 10, 2022

s/JAMES P. O'CONNELL #4259  
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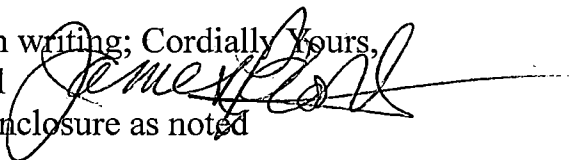
Barrett Ray Brewer  
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Post Office Box 1847  
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and to; Jenny Abbott Kitchings  
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RE: Appellate Case No. 2022-00011(2019-CP-23-7116) Jessie J. Carter v. Marco A. Quiroga, dba Oscar Auto Sales, et al

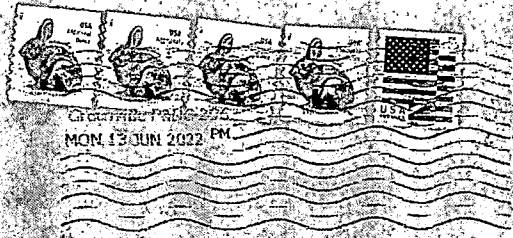
To Clerk of Court of Appeals and Attorney Brewer and Kappel:

Find here enclosed the Respondents Quiroga dba Oscar Auto Sales, Reply to the Initial Brief. The same is being served upon the addressed parties. A clocked in of record copy is requested to be returned to my office.

Advise promptly in writing; Cordially Yours,  
James P. O'Connell  
ATE Office Mgr. enclosure as noted



Connell  
139 Green St.  
Columbia SC 29204



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SC Court of Appeals

Jemy Abbott Kitchener  
Clerk of Court of Appeals  
P.O. Box 11629  
Columbia SC 29211

