

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

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

APPELLATE CASE NO. 2022-00011

JESSIE J. CARTER

APPELLANT

-V-

MARCO A, QUIROGA d/b/a OSCAR AUTO SALES, OSCAR QUIROGA
d/b/a OSCAR AUTO SALES AND PALMETTO SURETY CORPORATION
RESPONDENTS

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

FINAL BRIEF of Marco A. Quiroga d/b/a Oscar Auto Sales and Oscar
Quiroga d/b/a Oscar Auto Sales

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Statement of the Facts (Relevant facts are included in the argument section.)

Argument:

1. All issues should be heard by the trial court. Page 1

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TABLE OF AUTHORITIES

Cases: none

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?

STATEMENT OF THE CASE

Respondents Marco Quiroga dba Oscar Auto Sales and Oscar Quiroga dba Oscar Auto Sales repeat the statement of the Case as filed with the Initial Brief and Final 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 and Final 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 Replying request the Circuit Court Order be reversed.

September 27, 2022

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