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SEP 18 2025

SC Court of Appeals

REPLY BRIEF

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- I. Respondents argue that the trial Judge properly determined that the Petitioner had given for the work to be performed by them. The evidence that the Respondent presented was written authorization and disclaimer signed by the Petitioner. The appellant gave the Respondents permission to perform diagnostic testing only to the vehicle regarding the issues that she brought it in for. The Petitioner was told that the vehicle was torn down to the point of failure and that process had not been discussed with the Petitioner prior to that happening. The Respondents stated that the Petitioner had signed the disclaimer, but the signature is different than how the Appellant signs her name and believes that her signature was forged on the document. The Petitioner states that she never signed any other document outside of the form regarding diagnostic testing being performed.
- II. Respondents argue that the Circuit Court did not err in any manner in affirming the decision of the Magistrate. On May 6, 2024, at the Public Sale Hearing, the Respondents gave their testimony admitting that they had to remove the motor from the vehicle, without the Petitioner's permission, to take pictures for the warranty company. (Trial transcript)
- III. Respondents argue that there was no claim for fraud or negligence raised in the hearing. Mr. Wilson testified that there was miscommunication, and the warranty company did not tell them to take the motor out, that proves that the Respondents were negligent in this matter. (Trial transcript)
- IV. Respondent argues that the Petitioner is not entitled to relief and has no meritorious claims. The Petitioner's should be entitled to relief because of the stress of this matter and being without her vehicle for an extended length of time, and the negligence of the Respondent not desiring to put the vehicle back together in it's original state.

#### CONCLUSION

For the above reasons, the decision of the circuit court order should be reversed, and the case remanded with instructions to enter judgement for the Appellant.

September 11, 2025

Respectfully submitted,

s/Barbara Ann Johnson

308 Ruby Street

Lake City, SC 29560

843-206-2523

Appellant

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
Kristi F. Curtis, Circuit Court Judge

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Case No. 2025-000242

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Barbara Ann Johnson ..... Appellant

McLaughlin Ford, ..... Respondent

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PROOF OF SERVICE

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I certify that I served a copy of the Appellant's Reply Brief to the South Carolina Court of Appeals by depositing a copy of the same in the United States Mail, postage prepaid on September 11, 2025, addressed to: Jenny Abbott Kitchings, Clerk P.O. Box 11629 Columbia, S.C. 29211

September 11, 2025

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Appellant

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY  
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Case No. 2025-000242

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Barbara Ann Johnson ..... Appellant

McLaughlin Ford, ..... Respondent

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PROOF OF SERVICE

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I certify that I served a copy of the Appellant's Reply Brief on the Respondent's attorney by depositing a copy of the same in the United States Mail, postage prepaid on September 11, 2025, addressed to: Michael M. Jordan, 10 Law Range Sumter, S.C. 29150.

September 11, 2025

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