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**Mar 09 2026**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

Case No. 2025-000242

Barbara Ann Johnson ..... Appellant.

v.

McLaughlin Ford, ..... Respondent

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FINAL REPLY BRIEF OF APPELLANT

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Barbara Ann Johnson  
308 Ruby Street  
Lake City, South Carolina  
29560 (843) 206-2523  
Appellant

## REPLY BRIEF

- I. Respondents argue that the trial judge properly determined that the Petitioner authorized the work performed by them. However, the evidence presented shows that the Petitioner only gave permission for diagnostic testing related to the issues she brought the vehicle in for. The Respondents admitted that the vehicle was torn down to the point of failure without the Petitioner's prior approval. The Petitioner further contends that the signature on the Respondents' disclaimer is not hers and believes it to be forged. She never signed any document other than the diagnostic authorization form.
- II. Respondents argue that the Circuit Court did not err in affirming the Magistrate's decision. However, during the Public Sale Hearing on May 6, 2024, the Respondents admitted that they removed the motor from the Petitioner's vehicle without permission, claiming it was to take pictures for the warranty company. (Trial transcript)
- III. Respondents argue there was no claim for fraud or negligence. However, testimony from Mr. Wilson established that the warranty company did not instruct McLaughlin Ford to remove the motor. This proves that the Respondents acted negligently in this matter. (Trial transcript)
- IV. Respondents argue that the Petitioner is not entitled to relief and that her claims lack merit. The Petitioner contends she should be granted relief due to the undue stress and hardship caused by being without her vehicle for an extended period, and the Respondents' continued refusal to reassemble the vehicle to its original condition.

## CONCLUSION

For the foregoing reasons, the decision of the Circuit Court should be reversed, and this case remanded with instructions to enter judgment in favor of the Appellant.

Respectfully submitted,

s/Barbara Ann Johnson

308 Ruby Street

Lake City, SC 29560

843-206-2523

Appellant

March 6, 2026